

1 JAMES M. NELSON, ESQ. (State Bar No. 91682); jnelson@dndmlawyers.com  
2 JOSEPH E. FINKEL, ESQ. (State Bar No. 167397); jfinkel@dndmlawyers.com  
3 ALEXANDER M. ARONOV, ESQ. (State Bar No. 316839); aaronov@dndmlawyers.com  
4 DONNELLY NELSON DEPOLO MURRAY & EFREMSKY  
5 A Professional Corporation  
6 201 North Civic Drive, Suite 239  
7 Walnut Creek, CA 94596  
8 Tel. No. (925) 287-8181  
9 Fax No. (925) 287-8188  
10  
11 Attorneys for Defendant  
12 Elliot Brandwene, M.D. and Stewart Lauterbach, M.D.  
13

14  
15 IN THE UNITED STATES DISTRICT COURT  
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
17

18  
19  
20 CYNTHIA GUTIERREZ, JOSE HUERTA, Case No. 16-CV-02645-SI  
21 SMH, RH and AH,  
22 Plaintiffs,  
23 vs.  
24 SANTA ROSA MEMORIAL HOSPITAL, ST. EVIDENCE IN SUPPORT OF MOTION OF  
25 JOSEPH HEALTH and DOES 1-50, inclusive, DEFENDANT STEWART LAUTERBACH,  
26 Defendants. M.D. FOR SUMMARY JUDGMENT  
27  
28 Date: June 8, 2018  
Time: 9:00 AM  
Dept.: Courtroom 1 – 17<sup>th</sup> Floor  
  
Complaint Filed: May 17, 2016  
Trial: November 19, 2018  
  
ASSIGNED FOR ALL PURPOSES TO:  
HON. SUSAN ILLSTON

29  
30 Comes now Defendant Stewart Lauterbach, M.D. and submits the following evidence in  
31 support of his motion for summary judgment.

32 TABLE OF CONTENTS  
33

- 34 Exhibit A Plaintiffs' Gutierrez Complaint, ECF Doc. No. 1  
35 Exhibit B Plaintiffs' Gutierrez Second Amended Complaint, ECF Doc. No. 56  
36 Exhibit C Excerpts of Medical Record from Santa Rosa Memorial Hospital, pp. 000219-  
37 000272;  
38 Exhibit D Excerpts of Deposition of Stewart Lauterbach, M.D.;  
39 Exhibit E Declaration of Daniel A. McDermott, M.D., with attached curriculum vitae; and

Exhibit F Declaration of Alexander M. Aronov in Support of Stewart Lauterbach, M.D.'s Motion for Summary Judgment.

3 | Dated: 04/25/2018

## DONNELLY NELSON DEPOLO MURRAY & EFREMSKY

By: Alex Aronov  
ALEXANDER M. ARONOV  
Attorneys For Defendant  
Elliot Brandwene, M.D. and Stewart Lauterbach, M.D.

DONNELLY NELSON DEPOLO MURRAY & EFREMSKY  
A Professional Corporation

## EXHIBIT A

1      Douglas C. Fladseth (Bar No. 083420)  
2      LAW OFFICE OF DOUGLAS C. FLADSETH  
3      1160 North Dutton Avenue, Suite 180  
4      Santa Rosa, California 95401  
5      Telephone: (707) 545-2600  
6      Fax: (707) 545-0552  
7      fladseth@aol.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

Northern District of California

11 CYNTHIA GUTIERREZ, JOSE HUERTA, Case No.  
12 SMH, RH and AH,**COMPLAINT**  
13 Plaintiffs,  
14 vs.  
15 SANTA ROSA MEMORIAL HOSPITAL, ST.  
16 JOSEPH HEALTH and DOES 1-50, inclusive,  
Defendants.

## **STATEMENT OF THE CASE**

19           1. CYNTHIA GUTIERREZ was 33 years old when she presented to Defendant  
20 SANTA ROSA MEMORIAL HOSPITAL at approximately 3:00 a.m. on February 25, 2015.

21       2. CYNTHIA GUTIERREZ was diabetic. She had end stage renal disease. She  
22 weighed 134 pounds and was 5' 2" tall.

23 || 3. She worked at a Panera restaurant in Rohnert Park, California.

24           4. Her husband is JOSE HUERTA. They have three minor children, ages 15, 11 and  
25           8.

26       5.     Because of her medical conditions, CYNTHIA was frequently a patient at  
27 SANTA ROSA MEMORIAL HOSPITAL'S emergency room.

28 | //

1       6. On this particular occasion, various laboratory and diagnostic tests were ordered.

2 Many of the test results were remarkable for the presence of life threatening disease.

3       7. Inexplicably, these “red flags” were ignored.

4       8. CYNTHIA was discharged from the emergency room at approximately 7:00 a.m.

5       9. CYNTHIA was sitting in the waiting room when she collapsed.

6       10. A Code Blue was called and she was resuscitated.

7       11. She was transferred to the ICU.

8       12. She has remained in a coma.

9       13. No explanation has been provided to the family as to how this occurred.

10      14. CYNTHIA has remained at SANTA ROSA MEMORIAL HOSPITAL, despite

11 attempts to transfer her elsewhere.

## **IDENTIFICATION OF PARTIES**

**A. Plaintiffs**

14 15. CYNTHIA GUTIERREZ, 200 Craubrook Way #203, Santa Rosa, CA 95407.  
15 16. JOSE HUERTA, 200 Craubrook Way #203, Santa Rosa, CA 95407.  
16 17. SMH, 200 Craubrook Way #203, Santa Rosa, CA 95407.  
17 18. RH, 200 Craubrook Way #203, Santa Rosa, CA 95407.  
18 19. AII, 200 Craubrook Way #203, Santa Rosa, CA 95407

## R Defendants

20        20.     SANTA ROSA MEMORIAL HOSPITAL (SRMH), 1165 Montgomery Drive,  
21     Santa Rosa, California 95405.

22        21.     ST. JOSEPH HEALTH, 3345 Michelson Drive, Ste 100, Irvine, CA 92612.

23        22.     Does 1-50.

## JURISDICTION AND VENUE

25        23. This case belongs in federal court under federal question jurisdiction because it is  
26 about federal law(s) or right(s) of EMTALA.

27 | Page

28 | //

1       24.     Venue is appropriate in this Court because all Defendants live in California and at  
2 least one of the Defendants lives in this district and because a substantial part of the events being  
3 sued about happened in this district.

4 25. Plaintiffs hereby demand a jury trial in this action.

## INTRADISTRICT ASSIGNMENT

6           26. This lawsuit should be assigned to San Francisco/Oakland Division of this Court  
7 because this is the district where the event occurred.

## **STATEMENT OF FACTS AND CLAIMS**

9           27. CYNTHIA GUTIERREZ was 33 years old when she presented to Defendant  
10 SRMH at approximately 3:00 a.m. on February 25, 2015.

11           28. CYNTHIA GUTIERREZ was diabetic. She had end stage renal disease. She  
12 weighed 134 pounds and was 5' 2" tall.

13 29. She worked at a Panera restaurant in Rohnert Park, California.

14           30. Her husband is JOSE HUERTA.

15           31. Because of her medical conditions, CYNTHIA was frequently a patient at  
16 SRMH'S emergency room.

17           32. On this particular occasion, various laboratory and diagnostic tests were ordered.  
18 Many of the test results were remarkable for the presence of life threatening disease.

19 ||| 33. Inexplicably, these “red flags” were ignored.

34. CYNTHIA was discharged from the emergency room at approximately 7:00 a.m.

21 35. CYNTHIA was sitting in the waiting room when she collapsed.

22 36. A Code Blue was called and she was resuscitated.

37. She was transferred to the ICU.

38. She has remained in a coma.

25 39. No explanation has been provided to the family as to how this occurred.

26 40. CYNTHIA has remained at SRMH, despite attempts to transfer her elsewhere.

27 41. Defendants performed a cursory and inadequate screening.

28 ||| 42. Defendants failed to stabilize CYNTHIA GUTIERREZ.

1       43. Defendants ignored even their own test results showing life-threatening, unstable  
2 conditions. They nonetheless intentionally and recklessly chose to simply discharge CYNTHIA  
3 GUTIERREZ.

4       44. As such, Defendants failed to comply with EMTALA requirements to reasonably  
5 screen and stabilize.

6       45. Defendants intentionally and recklessly and negligently refused and failed to  
7 follow federal law EMTALA and state law and their own policies and procedures all of which  
8 mandated medical screening and stabilization CYNTHIA'S emergency medical conditions when  
9 she presented to their ER.

10      46. Defendants' pattern and practice was to deny and avoid care for indigent and  
11 uninsured and underinsured and those with substance and/or mental health issues or apparent  
12 questionable immigration status.

13      47. Despite claiming to be a charitable and caring organization by history Defendants  
14 have instead placed corporate profits and revenues ahead of patient care and safety due to  
15 financial pressures they have received from competing facilities including but not limited to  
16 Sutter Heath and Kaiser and for other unknown reasons.

17      48. Defendants have previously and repeatedly "dumped" other patients in violation  
18 of EMTALA including but not limited to Michael Torres, whom they discharged to die in their  
19 parking lot due to severe pneumonia of days duration which went undiagnosed and untreated and  
20 for which the hospital was cited by federal authorities. They also "dumped" and refused even the  
21 most cursory exam to another recent victim who wishes to not be identified in the Complaint.  
22 They were also cited by Federal authorities for this second previous case.

23      49. Both such cases were prosecuted by the undersigned.

24      50. Defendants have also effectively discharged other patients by making them wait  
25 inordinate times and discouraging them from coming to the ER and by pretending to perform the  
26 requisite screening and stabilization procedures but instead minimizing all contacts and care and  
27 ///

28 ///

1 only seeking to try to avoid liability for violating EMTALA and other laws and the hospital's  
2 own policies and procedures.

3 51. SRMH has been repeatedly been cited for intentional understaffing by the CDPH  
4 [California Department of Public Health.]

5 52. SRMH has repeatedly discharged patients prematurely in order to maximize their  
6 income and profits regardless of the risks imposed thereby on the patients.

7 **FIRST CAUSE OF ACTION**

8 **(EMTALA 42 U.S.C. 1395dd)**

9 53. Plaintiffs reincorporate paragraphs 1 through 53, above.

10 54. Defendants dumped and failed to screen or stabilize CYNTHIA GUTIERREZ in  
11 violation of this law.

12 **SECOND CAUSE OF ACTION**

13 **(WELFARE & INSTITUTIONS CODE 15657 including 15657 Enhanced Remedies)**

14 55. Plaintiffs reincorporate paragraphs 1 through 54 above.

15 56. CYNTHIA GUTIERREZ was a dependent adult per Welfare and Institutions  
16 Section 15600, et seq. Defendants intentionally and recklessly neglected CYNTHIA causing her  
17 severe suffering and emotional distress.

18 **THIRD CAUSE OF ACTION**

19 **(Negligence)**

20 57. Plaintiffs reincorporate paragraphs 1 through 56 above.

21 58. General negligence including unreasonable care in violation of the above stated  
22 Federal and California statutory law and as well as in violation of Defendants' own policies and  
23 procedures as well as breach of Defendants' general and fiduciary duties to provide standard and  
24 reasonable care. Plaintiffs and each of them also claim damages as direct victims and as  
25 bystanders due to negligent infliction of emotional distress.

26 ///

27 ///

28 ///

Case 3:16-cv-02645-SI Document 1 Filed 05/17/16 Page 6 of 6

## **DEMAND FOR RELIEF**

Wherefore, Plaintiffs pray for relief as follows:

1. For damages, economic and non-economic, to each of Plaintiff according to proof;

2. For enhanced remedies pursuant to California State Welfare & Institutions Code §15657 including attorney fees;

3. For exemplary/punitive damages including but not limited to as provided for by California Civil Code §3294 based on Welfare & Institutions Code §15600, et seq. and EMTALA;

10           4.       For EMTALA related remedies including, but not limited to, attorney fees and  
11 costs and compensation to CYNTHIA GUTIERREZ and JOSE HUERTA and their family  
12 members and loved ones; and

13           5. Prejudgement interest in the amount of 10% per year or at the maximum level  
14 recoverable by law.

15 | DATED: May 16, 2016

## LAW OFFICES OF DOUGLAS C. FLADSETH

/s/

**DOUGLAS C. FLADSETH**  
Attorney for Plaintiffs

## **DEMAND FOR JURY TRIAL**

Plaintiffs hereby demand a jury trial in this action.

Dated: May 16, 2016

LAW OFFICES OF DOUGLAS C. FLADSETH

/s/

**DOUGLAS C. FLADSETH**  
Attorney for Plaintiffs

## EXHIBIT B

Case 3:16-cv-02645-SI Document 56 Filed 07/03/17 Page 1 of 8

1      Douglas C. Fladseth (Bar No. 083420)  
2      **LAW OFFICE OF DOUGLAS C. FLADSETH**  
3      **1160 North Dutton Avenue, Suite 180**  
4      **Santa Rosa, California 95401**  
5      **Telephone: (707) 545-2600**  
6      **Fax: (707) 545-0552**  
7      **fladseth@aol.com**

8      **Attorneys for Plaintiffs**

9      **UNITED STATE DISTRICT COURT**

10     Northern District of California

11     CYNTHIA GUTIERREZ, JOSE HUERTA,                  Case No. 16-cv-02645-SI  
12     SMH, RH and AH,  
13     Plaintiffs,

14     **SECOND AMENDED COMPLAINT**

15     SANTA ROSA MEMORIAL HOSPITAL,  
16     ST. JOSEPH HEALTH, TEAMHEALTH,  
17     CHASE DENNIS EMERGENCY MEDICAL  
18     GROUP, INC. ELLIOT BRANDWENE, M.D.,  
19     STEWART LAUTERBACH, M.D. and  
20     DOES 1-50, inclusive,

21     Defendants.

22     /

23     **STATEMENT OF THE CASE**

24     1.     CYNTHIA GUTIERREZ was 33 years old when she presented to Defendant  
25     SANTA ROSA MEMORIAL HOSPITAL at approximately 3:00 a.m. on February 25, 2015.

26     2.     CYNTHIA GUTIERREZ was diabetic. She had end stage renal disease. She  
27     weighed 134 pounds and was 5' 2" tall.

28     3.     She worked at a Panera restaurant in Rohnert Park, California.

29     4.     Her husband is JOSE HUERTA. They have three minor children, ages 15, 11  
30     and 8.

31     ///

1       5. Because of her medical conditions, CYNTHIA was frequently a patient at  
2 SANTA ROSA MEMORIAL HOSPITAL'S emergency room.

3       6. CYNTHIA had a previously documented severe adverse reaction/allergy to  
4 Dilaudid,

5       7. On this particular occasion, various laboratory and diagnostic tests were ordered.  
6 Many of the test results were remarkable for the presence of life threatening disease.

7       8. Inexplicably, these "red flags" were ignored.

8       9. CYNTHIA was discharged from the emergency room at approximately 6:35 a.m.

9       10. CYNTHIA was sitting in the waiting room when she collapsed.

10      11. CYNTHIA was administered Dilaudid shortly before her collapse.

11      12. A Code Blue was called and she was resuscitated.

12      13. She was transferred to the ICU.

13      14. She has remained in a coma.

14      15. No explanation has been provided to the family as to how this occurred.

15      16. CYNTHIA remained at SANTA ROSA MEMORIAL HOSPITAL for many  
16 months and is currently at Kentfield Rehabilitation Center.

#### IDENTIFICATION OF PARTIES

18      **A. Plaintiffs.**

19      17. CYNTHIA GUTIERREZ, 200 Craubrook Way #203, Santa Rosa, CA 95407.

20      18. JOSE HUERTA, 200 Craubrook Way #203, Santa Rosa, CA 95407.

21      19. SMH, 200 Craubrook Way #203, Santa Rosa, CA 95407.

22      20. RH, 200 Craubrook Way #203, Santa Rosa, CA 95407.

23      21. AH, 200 Craubrook Way #203, Santa Rosa, CA 95407.

24      **B. Defendants.**

25      22. SANTA ROSA MEMORIAL HOSPITAL (SRMH), 1165 Montgomery Drive,  
26 Santa Rosa, California 95405.

27      23. ST. JOSEPH HEALTH, 3345 Michelson Drive, Ste 100, Irvine, CA 92612.

28      24. TEAMHEALTH, 265 Brookview Centre Way, Ste 400, Knoxville, TN 37919

Case 3:16-cv-02645-SI Document 56 Filed 07/03/17 Page 3 of 8

1           25. CHASE DENNIS EMERGENCY MEDICAL GROUP, INC., 1165 Montgomery  
2 Drive, Santa Rosa, California 95405.

3           26. ELLIOT BRANDWENE, M.D., 3105 Burkhardt Ln, Sebastopol, CA 95472

4           27. STEWART LAUTERBACH, M.D., 1165 Montgomery Drive, Santa Rosa, CA  
5           95405

## **JURISDICTION AND VENUE**

7       28. This case belongs in federal court under federal question jurisdiction because it is  
8 about federal law(s) or right(s) of EMTALA.

9       29.     Venue is appropriate in this Court because the majority of the Defendants are  
10      based in California and at least one of the Defendants lives in this district and because a  
11      substantial part of the events being sued about happened in this district.

12 || 30. Plaintiffs hereby demand a jury trial in this action.

## **INTRADISTRICT ASSIGNMENT**

14       31. This lawsuit should be assigned to San Francisco/Oakland Division of this Court  
15 because this is the district where the event occurred.

## **STATEMENT OF FACTS AND CLAIMS**

17       32. CYNTHIA GUTIERREZ was 33 years old when she presented to Defendant  
18 SRMH at approximately 3:00 a.m. on February 25, 2015. She presented with persistent shortness  
19 of breath since 7:00pm the evening before.

20           33. CYNTHIA GUTIERREZ was diabetic. She had end stage renal disease. She  
21 weighed 134 pounds and was 5' 2" tall.

22       34.     CYNTHIA GUTIERREZ had, in defendant hospital's records, previously  
23 documented severe adverse reaction(s) to Dilaudid.

24           35. CYNTHIA GUTIERREZ previously worked at a Panera restaurant in Rohnert  
25 Park, California.

36. CYNTHIA GUTIERREZ's husband is JOSE HUERTA. She has three minor  
children.

28 | //

1       37.     Because of her medical conditions, CYNTHIA was frequently a patient at  
2 SRMH'S emergency room.

3       38.     On this particular occasion, various laboratory and diagnostic tests were ordered.  
4 Many of the test results were remarkable for the presence of life threatening disease.  
5 Supplemental oxygen was started. Her blood pressure was recorded as 177/97 at 3:51 a.m. At  
6 5:27 a.m. her blood glucose was recorded as 418 which is extremely out of normal range. Her  
7 Brain Natriuretic Peptide (BNP) was > 5000 with the normal range being 0-100. This evidences  
8 profound congestive heart failure. A chest x-ray demonstrated prominence of the pulmonary  
9 vascularity as well as bilateral interstitial infiltrates evidencing fluid overload with congestive  
10 heart failure.

11       39.     Despite this clear evidence of life threatening disease in a known diabetic with  
12 grossly abnormal blood sugar and extreme evidence of heart failure absolutely no screening was  
13 done to determine the presence or absence of diabetic ketoacidosis. The laboratory tests  
14 necessary to screen for this apparent disease process were simply not done. These necessary  
15 screening tests none of which were done include: 1. arterial blood gas, 2. urinalysis, 3. serum  
16 ketones and 4. anion gap calculations. These are all routine and standard screening exams  
17 especially for patients who present with compelling evidence of acute diabetic ketoacidosis.

18       40.     Instead of admitting CYNTHIA and providing the necessary screening tests and  
19 care, defendants chose instead to simply overdose her on narcotic pain medications which would  
20 further suppress her respiratory system and discharge her from the hospital. At 4:21 a.m. she was  
21 given 1 mg IV of Dilaudid. At 6:22 a.m. she was given an additional 1mg IV of Dilaudid. The  
22 Dilaudid was given ostensibly for right hand pain from peripheral neuropathy. It is not a usual or  
23 appropriate narcotic for that purpose. Dilaudid is synthetic heroin, eight times stronger than  
24 morphine. It is a respiratory depressant being given to a patient who presented with respiratory  
25 difficulty. It is contraindicated for someone like CYNTHIA who presents with respiratory  
26 distress such as persistent shortness of breath and particularly for someone with compelling  
27 evidence of acute congestive heart failure and fluid overload.

28       ///

1       41. Simply masking the problem and discharging the patient abdicates the ER's  
2 responsibility to provide appropriate screening tests as part of basic and fundamental emergency  
3 care.

4       42. CYNTHIA was discharged from the emergency room at 7:00 a.m. The ER  
5 physician and staff failed to admit MS. GUTIERREZ who continued to need ongoing screening,  
6 monitoring, care, treatment and custody for her acute condition.

7       43. CYNTHIA was sitting in the ER waiting room when she collapsed.

8       44. CYNTHIA was administered Dilaudid shortly before her collapse.

9       45. At 7:26 a.m. a Code Blue was called. This was one hour and four minutes after  
10 the staff administered IV Dilaudid to MS. GUTIERREZ. The record indicates she had no  
11 respirations at this time. Resuscitation was initiated.

12      46. She was transferred to the ICU.

13      47. She has remained in a coma.

14      48. No explanation has been provided to the family as to how this occurred.

15      49. Defendants performed a cursory and inadequate screening.

16      50. Defendants failed to stabilize CYNTHIA GUTIERREZ.

17      51. Defendants ignored even their own test results showing life-threatening, unstable  
18 conditions. They nonetheless intentionally and recklessly chose to simply discharge CYNTHIA  
19 GUTIERREZ.

20      52. As such, Defendants failed to comply with EMTALA requirements to reasonably  
21 screen and stabilize.

22      53. Defendants intentionally and recklessly and negligently refused and failed to  
23 follow federal law EMTALA and state law and their own policies and procedures all of which  
24 mandated medical screening and stabilization of CYNTHIA'S emergency medical conditions  
25 when she presented to their ER.

26      54. Defendants' pattern and practice was to deny and avoid care for indigent and  
27 uninsured and under insured and including, but not limited to, Medi-Cal patients such as  
28 CYNTHIA and those with substance and/or mental health issues and/or apparent minority or

Case 3:16-cv-02645-SI Document 56 Filed 07/03/17 Page 6 of 8

1 questionable immigration status and/or with Hispanic surnames and/or appearances such as  
2 CYNTHIA GUTIERREZ.

3       55. Despite claiming to be a charitable and caring organization by history Defendants  
4 have instead placed corporate profits and revenues ahead of patient care and safety due to  
5 financial pressures they have received from competing facilities including but not limited to  
6 Sutter Heath and Kaiser and for other unknown reasons.

7       56. Two prior cases, violating EMTALA by these same defendants, have also been  
8 prosecuted by the undersigned. It is requested that the court take judicial notice of the federal and  
9 state investigations copies attached hereto as Exhibit 1 & 2 citing these same defendants for  
10 EMTALA and other violations in each of the above mentioned cases.

11       57. Defendants have also effectively discharged other patients by making them wait  
12 inordinate times and discouraging them from coming to the ER and by pretending to perform the  
13 requisite screening and stabilization procedures but instead minimizing all contacts and care and  
14 only seeking to try to avoid liability for violating EMTALA and other laws and the hospital's  
15 own policies and procedures.

16       58. SRMH has been repeatedly been cited for intentional understaffing by the CDPH  
17 [California Department of Public Health.]

18       59. It has just been discovered, at the deposition of CPR responding Emergency  
19 room doctor, Dr. Lauterbach, taken by the hospital's attorney, beginning on March 22, 2017, that  
20 defendants have unreasonably failed to provide and include all the critical records pertaining to  
21 this event. Defendants for the first time produced a next day "addendum" authored by the CPR  
22 responding Emergency room doctor, Dr. Lauterbach, claiming that CYNTHIA GUITIERREZ  
23 was found to have food blocking her airway. No such blockage was mentioned in any of the  
24 previously provided records (>30,000 produced), including but not limited to the original note by  
25 Dr. Lauterbach, nor by the responding Respiratory Therapist, nor by the treating ICU doctor, nor  
26 anyone else, that day, nor at any other time (other than a few vague references by Defendant only  
27 after this motion was filed and without apparent basis since no "addendum" was in the originally  
28 produced records).

Case 3:16-cv-02645-SI Document 56 Filed 07/03/17 Page 7 of 8

1       60. It has also just been discovered, at the deposition of CPR responding Emergency  
2 room doctor, Dr. Lauterbach, taken by the hospital's attorney, beginning on March 22, 2017, by  
3 and through the hospital attorney's questioning, that the previously documented history of major  
4 adverse reactions to Dilaudid was ignored and undocumented, thereby concealing a significantly  
5 reckless contribution to CYNTHIA GUTIERREZ respiratory arrest.

6        61. CYNTHIA GUTIERREZ hereby further requests leave of court for the time  
7 necessary to conduct her own discovery from defendants including but not limited to discovery  
8 of the records of other patients similarly presenting to defendant's ER and also including  
9 discovery of defendant's written policies and procedures for similarly presenting patients and  
10 also in order to obtain testimony under oath from the treating doctors and nurses at defendants  
11 ER regarding the practices and policies and procedures in place at this ER. This discovery will  
12 allow CYNTHIA to further elaborate her factual basis for disparate screening.

13       62. CYNTHIA GUTIERREZ hereby further requests leave of court for the time  
14 necessary to conduct her own discovery from defendants including but not limited to defendants'  
15 EMR (Electronic Medical Records) in use at the time in question and also including defendants'  
16 EMR policies and procedures and also including

**FIRST CAUSE OF ACTION**

(EMTALA 42 U.S.C. 1395dd)

19 ||| 63. Plaintiffs reincorporate paragraphs 1 through 62, above.

64. Defendants “dumped” and failed to screen or stabilize CYNTHIA GUTIERREZ  
in violation of this law.

## **SECOND CAUSE OF ACTION**

### (Negligence)

24 ||| 65. Plaintiffs reincorporate paragraphs 1 through 64 above.

25       66. General negligence including unreasonable care and lack of reasonable and  
26 necessary care in violation of the above stated Federal and California statutory law and as well as  
27 in violation of Defendants' own policies and procedures as well as breach of Defendants' general  
28 and fiduciary duties to provide standard and reasonable care. Plaintiffs and each of them also

Case 3:16-cv-02645-SI Document 56 Filed 07/03/17 Page 8 of 8

1 claim damages as direct victims and as bystanders due to negligent infliction of emotional  
2 distress.

3 **DEMAND FOR RELIEF**

4 Wherefore, Plaintiffs pray for relief as follows:

5 1. For damages, economic and non-economic, to each of Plaintiffs according to  
6 proof;

7 2. For enhanced remedies EMTALA, including attorneys fees;

8 3. For exemplary/punitive damages including but not limited to as provided for by  
9 EMTALA;

10 4. For EMTALA related remedies including, but not limited to, attorney fees and  
11 costs and compensation to CYNTHIA GUTIERREZ and JOSE HUERTA and their family  
12 members and loved ones; and

13 5. Prejudgement interest in the amount of 10% per year or at the maximum level  
14 recoverable by law.

15  
16 DATED: July 3, 2017

LAW OFFICES OF DOUGLAS C. FLADSETH

17  
18 /s/  
19

DOUGLAS C. FLADSETH  
Attorney for Plaintiffs

20 **DEMAND FOR JURY TRIAL**

21 Plaintiffs hereby demand a jury trial in this action.

22 Dated: July 3, 2017

LAW OFFICES OF DOUGLAS C. FLADSETH

23  
24 /s/  
25

DOUGLAS C. FLADSETH  
Attorney for Plaintiffs

26  
27  
28

## EXHIBIT C

**Santa Rosa Memorial Hosp.**

1165 Montgomery Dr  
Santa Rosa, CA 95405  
707-546-3210

**MRN#:** SM02706496  
**Patient:** GUTIERREZ,CYNTHIA  
**Report Status:** Signed  
**Documented By:** BRAEL001  
**Documented Date:** 02/25/15 0334

**Account#:** SV0083448385  
**Report Type:** EDPHYRPT  
**Report Mnemonic:** PHY.ER  
**Report#:** 0225-0042  
**Facility:** NSM

**Emergency Department Report**

**History of Present Illness**

**HPI**

**Service date**  
2/25/15

**Time Seen by MD:** 03:34

**Chief complaint:** shortness of breath

The patient is a thirty three year old female with history of ESRD on hemodialysis brought in by private vehicle with persistently shortness of breath since 19:00 yesterday. She states her last dialysis was yesterday, states she was instructed to not drink to much, but admits to drinking three glasses of water yesterday evening. She denies fever, chills, cough, chest pain, nausea, vomiting, or diarrheal is having bilateral arm pain.

**Onset/Duration/Timing:** started approximately - 19:00 yesterday, worsening

**Context:**

Dyspnea

**Severity:** moderate

**Aggravated by:** lying flat

**Alleviated by:** sitting up

**Past Medical History**

**Coded Allergies:**

No Known Allergies (Unverified , 2/25/15)  
per husband, no known allergies

**Active Scripts**

Hydrocodone Bit/Acetaminophen (Norco 10-325 Tablet)10 Mg/325 Mg Tab1 Tab PO Q6HR PRN (PAIN, Moderate to Severe(4-10)) #20 TAB

Prov:Brandwene,Elliott L 2/25/15

Oxycodone Hcl/Acetaminophen (Percocet 10-325 Mg Tablet)1 Each Tablet1 Tab PO Q4HR #10 TAB

Prov:Brandwene,Elliott L 2/6/15

Hydrocodone Bit/Acetaminophen (Norco 5-325 Tablet)5 Mg/325 Mg Tab1-2 Tab PO Q6H PRN (PAIN, Moderate to Severe(4-10)) #15 TAB

Prov:Allred,Kendall S 2/1/15

Metoclopramide Hcl (Reglan)10 Mg Tab10 Mg PO ACHS #120 TAB Ref 3

Prov:Altaf,Mujeeb 1/22/15

Hydrocodone Bit/Acetaminophen (Norco 5-325 Tablet)5 Mg/325 Mg Tab1 Tab PO Q6H PRN (PAIN, Mild (1-3)) #30 TAB Ref 0

Prov:Quang,Angela M 1/16/15

Amlodipine Besylate (Norvasc)5 Mg Tab5 Mg PO DAILY 30 Days

Prov:Junck,Daniel L 1/5/15

Atorvastatin Calcium (Lipitor)20 Mg Tab20 Mg PO QPM #30 TAB Ref 0

Prov:Quang,Angela M 12/17/14

Furosemide (Lasix)80 Mg Tablet80 Mg PO DAILY #30 TAB

Prov:Altaf,Mujeeb 12/3/14

Ondansetron (Zofran Odt)4 Mg Tab.rapidis4 Mg PO BID PRN (NAUSEA/VOMITING) #10 TAB

**Patient:** GUTIERREZ,CYNTHIA

**Adm Phys:**

**MRN#:** SM02706496

**Santa Rosa Memorial Hosp.**

1165 Montgomery Dr  
 Santa Rosa, CA 95405  
 707-546-3210

Prov:Muller,Ridgely O

11/2/14

**Reported Medications**

Hydralazine Hcl 50 Mg Tablet50 Mg PO BID #120 TAB

1/13/15

Metoprolol Tartrate 100 Mg Tablet100 Mg PO BID #60 TAB

TO TAKE AM OF SURGERY

1/13/15

Brimonidine Tartrate (Brimonidine Tartrate 0.2%)5 MI Drops1 Drop BOTH EYES TID #5 ML

6/7/14

Timolol Maleate (Timolol Maleate Ophth Soln 0.5%)10 MI Drops1 Drop BOTH EYES BID #10 ML

6/7/14

Latanoprost 2.5 MI Drops1 Drop BOTH EYES QPM #2.5 ML

6/7/14

**Travel History**

Travel and/or hospitalization outside the US in the last 30 days?

**Past medical records:** reviewed**Cardiovascular history:** HTN, CAD, heart failure, : - pericardial effusion, tetrology of fallot surgery**Respiratory history:** tuberculosis - TESTED POSITIVE AS A CHILD. TOOK MEDS FOR 6 MONTHYS, : - CHF, no asthma, no COPD**Neurological history:** seizures - pt has not have one since age two , : - diabetic neuropathy**Endocrine history:** DM type 1, DM type 2 - has been hospitalized for this many times, no hypothyroidism**Renal history:** renal insufficiency - Stage 3, renal failure - CRF STAGE 3 KIDNEY DISEASE, dx'd in March 2014, dialysis - AV Fisyula left upper arm, : - hx of nephrotic syndrome with anasarca**Other pertinent history:** chronic pain, back pain**Surgical history:** : - partial thyroidectomy, tubal ligation, pancreas (childhood), thyroid (2011), no cholecystectomy**Other past history:**

partial pancreas removal

blind in left eye secondary to glaucoma

**Gynecological history:** no endometriosis**Family history of:**

no Pertinent family history

**Other family history:**

reviewed, not relevant

**Smoking Status:** Never A Smoker**History Of Substance Abuse:** Yes**Substance:** Patient Denies Substance Abuse, Illicit Drugs**Other social history:**

lives with husband, 3 kids and mother-in-law

worked as a dishwasher

**Review of systems****Respiratory:** see HPI**Comprehensive ROS:** all other systems reviewed:negative**Physical Exam****Exam****Vital signs**

Initial Vital Signs

Date Time	Temp	Pulse	Resp	B/P	Pulse Ox	O2 Delivery	O2 Flow Rate	FiO2
2/25/15 03:51	98.7	86	2	177/97	94	Room Air		
2/25/15 05:27							2	

**Patient:** GUTIERREZ,CYNTHIA**Adm Phys:****MRN#:** SM02706496

Page 2 of 6

000220

SRMH(2) 27613

**Santa Rosa Memorial Hosp.**

1165 Montgomery Dr  
 Santa Rosa, CA 95405  
 707-546-3210

2/25/15 08:55								40
---------------	--	--	--	--	--	--	--	----

Sp O2: 94% on RA, interpretation: normal

**General appearance:** alert

**EENT:** normal eyes inspection, normal ENT inspection, normal pharynx

**Respiratory:** breath sounds normal, breath sounds equal

**Cardiovascular:** regular rate and rhythm, pulses equal/full x 4 extremities, no JVD present, no gallop, no systolic murmur, no diastolic murmur

**Abdomen/GU:** normal bowel sounds, soft, no distention, no tenderness, no guarding, no rebound

**Skin:** color normal, warm, dry, no cyanosis

**Neurologic:** oriented X4 and GCS = 15, cranial nerves intact, normal motor

**Psych:** normal mood and affect

**Data****Vital Signs**

Date Time	Temp	Pulse	Resp	B/P	Pulse Ox	O2 Delivery	O2 Flow Rate	FiO2
2/25/15 08:55		86			97			40
2/25/15 07:00	98.2 98.2	83	20	145/89	97	Room Air	2	
2/25/15 06:41	98.2	83	20	145/89	97	Room Air		
2/25/15 05:27	98.2	86	21		97	Nasal Cannula	2	
2/25/15 04:27	98.7 98.7	86	2	177/97	94	Room Air		
2/25/15 03:51	98.7	86	2	177/97	94	Room Air		

**Medications Administered**

Given in ED

**Diagnostics & Interpretation****Initial ECG (Interp. by ED MD):**

Date: Feb 25, 2015

Time: 04:08

Heart rate: 86

Normals: NSR, normal axis, normal intervals

Rhythm: NSR

Interpretation: unchanged from prior, interpreted by ED MD

**X-RAY (Interpreted by EP) :**

Read by: Emergency Physician

X-RAY type: chest

# of views: 1

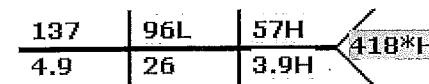
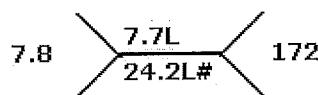
**Comments**

pulmonary vascular congestion

**Result Diagram:**

2/25/15 0350

2/25/15 0350

**Lab Results**

Patient: GUTIERREZ,CYNTHIA

Adm Phys:

MRN#: SM02706496

**Santa Rosa Memorial Hosp.**

1165 Montgomery Dr  
 Santa Rosa, CA 95405  
 707-546-3210

## Laboratory Tests

Test	2/25/15 03:50	2/25/15 06:14
WBC	7.8 $10^3/\mu\text{L}$ (3.5-11.0)	
RBC	2.66 L $10^6/\mu\text{L}$ (3.50-5.50)	
Hgb	7.7 L g/dL (12.0-15.0)	
Hct	24.2 #L % (36.0-45.0)	
MCV	91 # fL (79-95)	
Plt Count	172 THD/ $\mu\text{L}$ (120-400)	
Seg Neutrophils %	73.4 H % (34-64)	
Lymphocytes %	16.6 L % (19-48)	
Monocytes %	6.6 (3-9)	
Eosinophils %	2.4 % (0-7)	
Basophils %	1.0 % (0-2)	
Sodium	137 mmol/L (136-144)	
Potassium	4.9 mmol/L (3.6-5.1)	
Chloride	96 L mmol/L (101-111)	
Carbon Dioxide	26 mmol/L (22-32)	
Anion Gap	15.0 H (3.0-11.0)	
BUN	57 H mg/dL (8-20)	
Creatininine	3.9 H mg/dL (0.40-1.00)	
Est GFR (African Amer)	17 L ml/min <td></td>	
Est GFR (Non-Af Amer)	14 L ml/min <td></td>	
Glucose	418 *H mg/dL (65-99)	
Calcium	8.0 L mg/dL (8.9-10.3)	
Total Bilirubin	0.5 mg/dL (0.3-1.2)	
AST	27 IU/L (15-41)	
ALT	93 H IU/L (14-54)	
Alkaline Phosphatase	290 H IU/L (32-91)	
Rapid CK-MB (CK-2)	5.1 ng/mL	

Patient: GUTIERREZ,CYNTHIA  
 Adm Phys:  
 MRN#: SM02706496

**Santa Rosa Memorial Hosp.**

1165 Montgomery Dr  
 Santa Rosa, CA 95405  
 707-546-3210

	(0.6-6.3)	
Rapid Troponin I	< 0.05 ng/mL (<0.05)	
Rap B-Natriuretic Pept	> 5000 *H pg/mL (0-100)	
Total Protein	6.8 gm/dL (6.1-7.9)	
Albumin	3.3 g/dL (3.5-4.8)	
Globulin	3.5 gm/dL (2.3-3.5)	
POC Glucose		313 H mg/dL (65-99)

**Medical Decision Making****Progress Notes****Progress Note :**

Date: Feb 25, 2015

Time: 06:05

**Note**

Re-examined patient, states she feels much better.

**Disposition****Latest vital signs**

Vital Signs

	2/25/15 07:00	2/25/15 08:55
Temp	98.2 98.2	
Pulse		86
Resp	20	
B/P	145/89	
Pulse Ox		97
O2 Delivery	Room Air	
O2 Flow Rate	2	
FiO2		40

**Impression:**

Primary Impression: ESRD (end stage renal disease) on dialysis

Additional Impressions: Poorly controlled diabetes mellitus, Neuropathy, Chronic pain, Anemia

Condition: Stable

Disposition: Discharge Home

Patient instructions: AFTERCARE, Diabetic Neuropathy, ED Chronic Pain, ED Chronic Renal Failure

**Additional instructions:**

Please follow up at dialysis as scheduled tomorrow, and return to the emergency department sooner for worsening symptoms or any other concerns.

**Referrals:**

Southwest Community Health Cli (PCP)

**Scripts on discharge**

Patient: GUTIERREZ,CYNTHIA

Adm Phys:

MRN#: SM02706496

**Santa Rosa Memorial Hosp.**

1165 Montgomery Dr  
Santa Rosa, CA 95405  
707-546-3210

Hydrocodone Bit/Acetaminophen (Norco 10-325 Tablet)10 Mg/325 Mg Tab1 Tab PO Q6HR PRN (PAIN, Moderate to Severe(4-10)) #20 TAB  
Prov:Brandwene,Elliott L

2/25/15

**Attestation**

*Documentation prepared by Glenister, Sarah , acting as medical scribe for and in the presence of Dr. Brandwene*  
**2/25/15 04:07**

All medical record entries made by the scribe were at my direction and in my presence. I have reviewed the chart and agree that the record accurately reflects my personal performance of the history, physical exam, medical decision making, and the emergency department course for this patient. I have also personally reviewed and agree with the discharge instructions and disposition.

EMR and Dragon Attestation - this medical document was created using an electronic medical record system with Dragon computerized dictation system. Although this document has been carefully reviewed, there may still be some phonetic and typographical errors. These errors are purely typographical, due to imperfections of the software programs, and do not reflect any compromise in the patient's medical care.

Brandwene,Elliott L  
Glenister,Sarah SCRIBE

Feb 25, 2015 03:34  
Feb 25, 2015 04:07

*This is not considered FINAL until Signed by a Physician*

Authenticated By:  
<Electronically signed by Elliott L Brandwene MD> 03/05/15 1343

Elliott L Brandwene

cc:

Patient: GUTIERREZ,CYNTHIA  
Adm Phys:  
MRN#: SM02706496

Page 6 of 6

SRMH(2) 27617

000224

DATE: 03/27/15 @ 0023  
USER: EDM MNR

Northern California EDM \*LIVE\*  
ED Summary Report

PAGE 1

## Santa Rosa Memorial

**Patient:** GUTIERREZ, CYNTHIA      **Date:** 02/25/15      **Room:** 0341      **Acct#:** SV0083448385  
**Gender:** F      **DOB:** 07/31/1981      **Height:** 5 ft 3 in      **Unit#:** SM02706496  
**Status:** DEP ER      **Weight:** 56.000 kg      **Dep'd:** 02/25/15 0702  
**ED.Phys:** Brandwene, Elliott L      **PC.Phys:** Southwest Community, Health Cli

## PATIENT DEMOGRAPHICS

3492 STONY POINT RD  
SANTA ROSA, CA 95407  
714-673-1287

**Insurance:** Partnership Managed Medicaid      **PCP:** Southwest Community, Health Cli  
**Next of Kin:** HUERTA, JOSE      **Family Doctor:**  
**Relation:** Husband      **Referring:**  
**Phone:** 714-673-1287

## GENERAL DATA

**ED Physician:** Brandwene, Elliott L, ACT      **Arrival Date/Time:** 02/25/15 - 0326  
**Practitioner:**      **Triage Date/Time:** 02/25/15 - 0351  
**Nurse:** Cameron, Johnnie, RN      **Date of Birth:** 07/31/1981

**Stated Complaint:** CONGESTION/COUGH/NERVE PAIN?      **Priority:** 3  
**Chief Complaint:** Respiratory

## ALLERGIES

hydromorphone/cardiotopulmonary arrest

## REPORTED MEDICATIONS

Prescription/Reported Meds	Type	Issued	Provider	Entered
ONDANSETRON (ZOFRAN ODT) 4 Mg Tab.rapidis 4 MG PO Twice Daily As needed for NAUSEA/VOMITING, #10 TAB.RAPDIS	Rx	11/02/14	MULRI001	11/02/14
FUROSEMIDE (LASIX) 80 Mg Tablet 80 MG PO Daily, #30 TABLET	Rx	12/03/14	ALTMU001	12/03/14
ATORVASTATIN CALCIUM (LIPITOR) 20 Mg Tab 20 MG PO Every Evening, #30 TABLET REF 0	Rx	12/17/14	QUAAN002	12/17/14
AMLODIPINE BESYLATE (NORVASC) 5 Mg Tab 5 MG PO Daily 30 Days	Rx	01/05/15	JUNDA001	01/05/15
HYDROCODONE BIT/ACETAMINOPHEN (NORCO 5-325 TABLET) Mg/325 Mg Tab 1 TAB PO Q6H As needed for PAIN, Mild (1-3), #30 TAB REF 0	Rx	01/16/15	QUAAN002	01/16/15
METOCLOPRAMIDE HCL (REGLAN) 10 Mg Tab 10 MG PO Before Meals and at Bedtime, #120 TABLET REF 3	Rx	01/22/15	ALTMU001	01/22/15
HYDROCODONE BIT/ACETAMINOPHEN (NORCO 5-325 TABLET) Mg/325 Mg Tab 1-2 TAB PO Q6H As needed for PAIN, Moderate to Severe(4-10), #15 TAB	Rx	02/01/15	ALLKE002	02/01/15
OXYCODONE HCL/ACETAMINOPHEN (PERCOCET 10-325 MG TABLET) 1 Each Tablet 1 TAB PO Every 4 Hours, #10 TABLET	Rx	02/06/15	BRAEL001	02/06/15
LATANOPROST (LATANOPROST) 2.5 ML Drops	Reported			06/07/14

GUTIERREZ, CYNTHIA      **Acct#:** SV0083448385      **Unit#:** SM02706496  
**Gender:** F      **DOB:** 07/31/1981



000225

SRMH(2) 27618

DATE: 03/27/15 @ 0023  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 2

**Santa Rosa Memorial**

Patient: GUTIERREZ, CYNTHIA  
 Age/Sex 33/F DOB 07/31/1981  
 Status DEP ER  
 ED.Phys Brandwene, Elliott L

02/25/15 0341 Room  
 Height 5 ft 3 in  
 Weight 56.000 kg  
 PC.Phys Southwest Community, Health Cli

Prescription/Reported Meds	Type	Issued	Provider	Entered
1 DROP BOTH EYES Every Evening, #2.5 DROPS TIMOLOL MALEATE (TIMOLOL MALEATE OPHTH SOLN 0.5%)	Ml Drops	10	Reported	06/07/14
1 DROP BOTH EYES Twice Daily, #10 DROPS BRIMONIDINE TARTRATE (BRIMONIDINE TARTRATE 0.2%)	5 Ml Drops	Reported	06/07/14	
1 DROP BOTH EYES Three Times Daily, #5 DROPS METOPROLOL TARTRATE (METOPROLOL TARTRATE) 100 Mg Tablet	Reported	01/13/15		
100 MG PO Twice Daily, #60 TABLET HYDRALAZINE HCL (HYDRALAZINE HCL) 50 Mg Tablet	Reported	01/13/15		
50 MG PO Twice Daily, #120 TABLET				

**TRIAGE VITAL SIGNS**

Date/Time	Systolic	Diastolic	Pulse	Resp	Pulse Ox	Temp	Pain Intensity	User
02/25/15 0351	177	97	86	2	94	98.7	8	CAMEROJO00...

**OXYGENATION**

Date/Time	Pulse Ox	Oxygen Delivery Method	User
02/25/15 0351	94	Room Air	CAMEROJO01, RN

**VITAL SIGNS**

Date/Time	Systolic	Diastolic	Pulse	Resp	Pulse Ox	Temp	Pain Intensity	User
02/25/15 0427	177	97	86	2	94	98.7	9	CAMEROJO00...
02/25/15 0527			86	21	97	98.2		CAMEROJO00...
02/25/15 0641	145	89	83	20	97	98.2	1	CAMEROJO00...

Date/Time	Temperature (Celsius)	User
02/25/15 0427	37.05852	CAMEROJO01, RN

**ASSESSMENTS**

02/25/15 0329 ED Past Medical History Adult	Collins, Bernadette, RN
Past Medical History Y	
Multiple Sclerosis N	
Parkinson's Disease N	
Seizures Y	
Comment pt has not have one since age two	
Glucoma Y	
Macular Degeneration N	
Other HEENT Disorders no vision in left eye, getting eye injections in right eye	
Pacemaker N	
Internal Defibrillator (AICD) N	
Arrhythmia N	
Cardiac Catheterization/PCI N	
Hypertension Y	

GUTIERREZ, CYNTHIA	Acct# SV0083448385	Unit# SM02706496
Age/Sex 33/F DOB 07/31/1981		



000226

SRMH(2) 27619

DATE: 03/27/15 @ 0023  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 3

**Santa Rosa Memorial**

Patient: GUTIERREZ, CYNTHIA      02/25/15 0341 Room      Acct# SV0083448385  
 Age/Sex 33/F      DOB 07/31/1981      Height 5 ft 3 in      Unit# SM02706496  
 Status DEP ER      Weight 56.000 kg      Dep'd 02/25/15 0702  
 ED.Phys Brandwene, Elliott L      PC.Phys Southwest Community, Health Cli

Palpitations N  
 Other Cardiovascular Disorders CHF  
 Asthma N  
 COPD N  
 Other Respiratory Disorders HX PERICARDIAL EFFUSIONS  
 Crohn's Disease N  
 Diverticulosis N  
 Esophageal Varices N  
 Pancreatitis N  
 Other GI Disorder partial pancreatectomy, gastroparesis  
 Dialysis Y  
 Comment AV Fisyula left upper arm  
 Prostate Problems N  
 Renal Failure Y  
 Comment CRF STAGE 3 KIDNEY DISEASE, dx'd in March 2014  
 Other Genitourinary Disorders GASTROPPARESIS  
 LEFT UPPER ARM DIALYSIS SHUNT JAN/2015

Endometriosis N  
 Fibroids N  
 Epididymitis N  
 Other Reproductive Disorders tubal ligation  
 Arthritis, Rheumatoid N  
 Back Injury N  
 bromyalgia N  
 Other Musculoskeletal Disorders "NERVE PAIN"  
 Eating Disorder N  
 Panic Disorder N  
 Diabetes Mellitus Type 1 Y  
 Diabetes Mellitus Type 2 Y  
 Comment has been hospitalized for this many times  
 Hyperthyroidism N  
 Hypothyroidism N  
 Systemic Lupus Erythematosus N  
 Anemia Y  
 History Acquired Immunodeficiency Disease N  
 MRSA N  
 Bone N  
 Brain N  
 Breast N  
 Colorectal N  
 Leukemia N  
 Lymphoma N  
 Prostate N  
 Skin N  
 Chemotherapy N  
 Radiation Therapy N  
 Other Medical History kidney failure  
 Surgical History Y  
 Comment Partial pancreas removed as an infant  
 Cardiovascular Surgery Y

GUTIERREZ, CYNTHIA  
 /Sex 33/F      DOB 07/31/1981  
 Status DEP ER

Acct# SV0083448385

Unit# SM02706496



000227

SRMH(2) 27620

DATE: 03/27/15 @ 0023  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 4

## Santa Rosa Memorial

Patient: GUTIERREZ, CYNTHIA      02/25/15 0341 Room      Acct# SV0083448385  
 Age/Sex 33/F      DOB 07/31/1981      Height 5 ft 3 in      Unit# SM02706496  
 Status DEP ER      Weight 56.000 kg      Dep'd 02/25/15 0702  
 ED.Phys Brandwene, Elliott L      PC.Phys Southwest Community Health Cli

Heart Valve Replacement N  
 HEENT Surgery N  
 Endocrine Surgery Y  
 Comment partial pancreatectomy for hypoglycemia  
 Gastrointestinal Surgery Y  
 Comment PARTIAL PANCREAS REMOVAL  
 Cholecystectomy N  
 Genitourinary Surgery Y  
 Renal Transplant N  
 Orthopedic Surgery N  
 Joint Replacement N  
 Neurologic Surgery N  
 Reproductive Surgery Y  
 Gynecologic Surgery N  
 Mastectomy N  
 Transurethral Resection (TURP) N  
 Respiratory Surgery N  
 Tracheostomy N  
 Other Surgery N  
 Past Medical History Verified By Nurse With Patient/Family Y

02/25/15 0351 ED Adult Triage Assessment

Cameron, Johnnie, RN

History Of Present Illness pT REPORTS, "I HAVE HAD SHORTNESS OF BREATH SINCE 7PM LAST EVENING. Last dialysis one day ago. " Pt also c/o bilateral hand pain.

Informant Patient  
 Primary Language English  
 Interpreter Offered N  
 Means of Arrival Private Auto  
 Arrival From Home  
 Temp 98.7  
 Temperature (Calculated Celsius) 37.05852  
 Temperature Source Oral  
 Pulse 86  
 Resp 2  
 Pulse Ox 94  
 Oxygen Delivery Method Room Air  
 Systolic 177  
 Diastolic 97  
 Mean 123  
 Traveled Or Hospitalized Outside USA In Last 30 Days No  
 Reported Pain Pain Present  
 Pain Intensity 8  
 Height (Feet) 5  
 Height (Inches) 3  
 Height (Calculated Centimeters) 160.0  
 Height Measurement Method Stated  
 Weight (Kilograms) 56  
 Weight Source Stated  
 Is Patient Female? N

GUTIERREZ, CYNTHIA  
 /Sex 33/F      DOB 07/31/1981  
 Status DEP ER

Acct# SV0083448385

Unit# SM02706496



000228

SRMH(2) 27621

DATE: 03/27/15 @ 0023  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 5

## Santa Rosa Memorial

Patient: GUTIERREZ, CYNTHIA  
 Age/Sex 33/F DOB 07/31/1981  
 Status DEP ER  
 ED.Phys Brandwene, Elliott L

02/25/15 0341 Room  
 Height 5 ft 3 in  
 Weight 56.000 kg  
 PC.Phys Southwest Community, Health Cli

Acct# SV0083448385  
 Unit# SM02706496  
 Dep'd 02/25/15 0702

Currently Pregnant? N  
 Currently Breastfeeding? N  
 Priority 3 Urgent

02/25/15 0359 ED Patient Education Assessmnt

Cameron, Johnnie, RN

Barriers To Learning None  
 Focus Education To Patient  
 Education Topic Plan Of Care

02/25/15 0359 ED Focal Head To Toe Assessmnt

Cameron, Johnnie, RN

Eye Opening Spontaneously 4  
 Verbal Response Oriented and Converses 5  
 Motor Response Obeys Commands 6  
 Glasgow Coma Scale Total 15

02/25/15 0359 ED Screening Assessment

Cameron, Johnnie, RN

Last Tetanus Less Than 10 Years  
 Pressure Ulcer Prior To Admission N  
 Mode Of Transportation Ambulatory  
 Religious/Cultural Beliefs That May Affect Your Medical Care N  
 Recent Victim Of Physical/Emotional/Financial Abuse N  
 Do You Feel Safe Returning Home N  
 Barriers To Learning None

History Of Falls No  
 Secondary Diagnosis Yes

Ambulatory Aid None  
 IV/IV Access Yes

Gait Transferring Normal

Mental Status Oriented To Own Ability  
 Patient's Fall Risk Standard Fall Risk

Standard Interventions-All Patients Belongings Within Reach, Frequent Rounding,  
 Bed Brakes On, Call Light In Reach,  
 Bed In Lowest Position

Moderate/High Risk Falls Intervention Place near Nurses Station, Educate Pt/Family,  
 Fall Risk Signage Placed, Room Free Of Clutter,  
 Bed Alarm On While In Bed, Frequent Rounding,  
 Bed Brakes On, Belongings Within Reach,  
 Call Light In Reach

Smoking Status Former Smoker

Other Tobacco Use N

History Of Substance Use N

Are You Having Thoughts/Had Thoughts Of Hurting Yourself N

Are You Having/Had Thoughts Of Hurting Someone Else N

02/25/15 0401 ED TB Screening

Cameron, Johnnie, RN

History Of Active Tuberculosis No  
 Weight Loss No  
 Anorexia No  
 Fatigue No  
 Cough No Cough

GUTIERREZ, CYNTHIA

Acct# SV0083448385

Unit# SM02706496

Age/Sex 33/F DOB 07/31/1981  
 Status DEP ER



000229

SRMH(2) 27622

DATE: 03/27/15 @ 0023  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 6

## Santa Rosa Memorial

Patient: GUTIERREZ, CYNTHIA      02/25/15 0341 Room      Acct# SV0083448385  
 Age/Sex 33/F      DOB 07/31/1981      Height 5 ft 3 in      Unit# SM02706496  
 Status DEP ER      Weight 56.000 kg      Dep'd 02/25/15 0702  
 ED.Phys Brandwene, Elliott L      PC.Phys Southwest Community Health Cli

Fever No  
 Night Sweats No  
 Exposure No  
 Tuberculosis Precautions Standard Precautions

02/25/15 0402 ED Safety Rounding Assessment

Cameron, Johnnie, RN

Safety Rounds Pt Resting In Bed  
 Patient Positioning/ Turning Turns Self  
 Patient Activity Resting In Bed  
 Safety Precautions Call/Assistance Education, ID Band Verified/Placed, Bed In Low Position,  
 Door Open, Brakes Locked, Floors Clean Of Obstacles,  
 Call Light Within Reach  
 Side Rails Up x2

02/25/15 0421 ED Event Assessment

Cameron, Johnnie, RN

Event Assessment Comment Lab reports, pt has a BNP greater than 5000; Dr notified.

02/25/15 0427 ED Adult VS & Pain Assessment

Cameron, Johnnie, RN

Temp 98.7  
 Temperature (Celsius) 37.05852  
 Temperature (Calculated Celsius) 37.05852  
 Temperature Source Oral  
 Pulse 86  
 resp 2  
 pulse Ox 94  
 Oxygen Delivery Method Room Air  
 Systolic 177  
 Diastolic 97  
 Mean 123  
 Location Right Arm  
 Blood Pressure Source Automatic Cuff  
 Blood Pressure Position Semi-Fowlers  
 Cardiac Monitoring Y  
 Cardiac Rhythm Sinus Rhythm  
 Reported Pain Pain Present  
 Location Modifier Left  
 Pain Location Hand  
 Pain Description Pins/Needles  
 Pain Intensity 9

02/25/15 0431 ED Event Assessment

Cameron, Johnnie, RN

Event Assessment Comment Lab called and reported pt's glucose is 418; Dr notified.

02/25/15 0526 ED Safety Rounding Assessment

Cameron, Johnnie, RN

Safety Rounds Pt Resting In Bed  
 Present At Bedside Family  
 Patient Positioning/ Turning Turns Self  
 Patient Activity Resting In Bed  
 Safety Precautions Call/Assistance Education, ID Band Verified/Placed, Bed In Low Position,  
 Door Open, Brakes Locked, Floors Clean Of Obstacles

GUTIERREZ, CYNTHIA  
 Age/Sex 33/F  
 Status DEP ER

DOB 07/31/1981

Acct# SV0083448385

Unit# SM02706496



000230

SRMH(2) 27623

DATE: 03/27/15 @ 0023  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 7

## Santa Rosa Memorial

Patient: GUTIERREZ, CYNTHIA      02/25/15 0341 Room      Acct# SV0083448385  
 e/Sex 33/F      DOB 07/31/1981      Height 5 ft 3 in      Unit# SM02706496  
 Status DEP ER      Weight 56.000 kg      Dep'd 02/25/15 0702  
 ED.Phys Brandwene, Elliott L      PC.Phys Southwest Community, Health Cli

Side Rails Up x2

02/25/15 0527 ED Adult VS & Pain Assessment

Cameron, Johnnie, RN

Temp 98.2  
 Temperature (Calculated Celsius) 36.78072  
 Temperature Source Oral  
 Pulse 86  
 Resp 21  
 Pulse Ox 97  
 Oxygen Delivery Method Nasal Cannula  
 Oxygen Flow Rate 2  
 Location Right Arm  
 Blood Pressure Source Automatic Cuff  
 Blood Pressure Position Semi-Fowlers  
 Cardiac Monitoring Y  
 Cardiac Rhythm Sinus Rhythm  
 Reported Pain Denies Pain  
 Location Modifier Left  
 Pain Location Hand

02/25/15 0615 ED Event Assessment

Cameron, Johnnie, RN

Event Assessment Comment Accu chel 318; Dr notified.

02/25/15 0641 ED Adult VS & Pain Assessment

Cameron, Johnnie, RN

Temp 98.2  
 Temperature (Calculated Celsius) 36.78072  
 Temperature Source Oral  
 Pulse 83  
 Resp 20  
 Pulse Ox 97  
 Oxygen Delivery Method Room Air  
 Systolic 145  
 Diastolic 89  
 Mean 107  
 Location Right Arm  
 Blood Pressure Source Automatic Cuff  
 Cardiac Monitoring Y  
 Cardiac Rhythm Sinus Rhythm  
 Reported Pain Pain Present  
 Location Modifier Left  
 Pain Location Hand  
 Pain Description Aching  
 Pain Intensity 1

02/25/15 0642 ED Safety Rounding Assessment

Cameron, Johnnie, RN

Safety Rounds Pt Resting In Bed  
 Patient Positioning/ Turning Turns Self  
 Patient Activity Resting In Bed  
 Safety Precautions Call/Assistance Education, ID Band Verified/Placed, Bed In Low Position,  
 Door Open, Brakes Locked, Floors Clean Of Obstacles,

GUTIERREZ, CYNTHIA  
 e/Sex 33/F      DOB 07/31/1981  
 Status DEP ER

Acct# SV0083448385

Unit# SM02706496



000231

SRMH(2) 27624

DATE: 03/27/15 @ 0023  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 8

**Santa Rosa Memorial**

Patient: GUTIERREZ, CYNTHIA      02/25/15 0341 Room      Acct# SV0083448385  
 Age/Sex 33/F      DOB 07/31/1981      Height 5 ft 3 in      Unit# SM02706496  
 Status DEP ER      Weight 56.000 kg      Dep'd 02/25/15 0702  
 ED.Phys Brandwene, Elliott L      PC.Phys Southwest Community, Health Cli

Call Light Within Reach  
 Side Rails Up x2

02/25/15 0700 ED Adult Disposition Assessmnt

Cameron, Johnnie, RN

Temp 98.2  
 Temperature (Celsius) 36.78072  
 Temperature (Calculated Celsius) 36.78072  
 Temperature Source Oral  
 Pulse 83  
 Resp 20  
 Pulse Ox 97  
 Oxygen Delivery Method Room Air  
 Oxygen Flow Rate 2  
 Systolic 145  
 Diastolic 89  
 Mean 107  
 Reported Pain Denies Pain  
 Discharge/Transfer Paperwork Sent With Patient Y  
 After Care Instructions Given To Patient  
 After Care Instructions Comprehension Verbalizes Understanding  
 Discharged Via Walked  
 Discharge Mode Private Auto

**TREATMENTS**02/25/15 0413 ED IV Invasive Line Assessment

Cameron, Johnnie, RN

Location Right Hand  
 IV Line Type Peripheral IV  
 IV Site Observation/Evaluation Intact  
 Pre Hospitalization IV Start N  
 IV Gauge 22  
 Number Of Attempts 1

02/25/15 0414 ED EKG/ECG

Cameron, Johnnie, RN

EKG Results Reported To MD on duty

02/25/15 0422 ED Med Rec Completed

Cameron, Johnnie, RN

02/25/15 0659 ED Discontinue IV

Cameron, Johnnie, RN

Location Right Hand  
 Type Peripheral IV  
 Dressing Status Dressing Dry & Intact  
 IV Line Interventions Discontinued Intact

**MEDICATIONS**

GUTIERREZ, CYNTHIA  
 /Sex 33/F  
 Status DEP ER

DOB 07/31/1981

Acct# SV0083448385

Unit# SM02706496

SRMH(2) 27625  
000232

DATE: 03/27/15 @ 0023  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 9

**Santa Rosa Memorial**

Patient: GUTIERREZ, CYNTHIA  
 Age/Sex 33/F DOB 07/31/1981  
 Status DEP ER  
 ED.Phys Brandwene, Elliott L

02/25/15 0341 Room Acct# SV0083448385  
 Height 5 ft 3 in Unit# SM02706496  
 Weight 56.000 kg Dep'd 02/25/15 0702  
 PC.Phys Southwest Community, Health Cli

**Medication**

Sch Date-Time	Ordered Dose	Admin Dose	
Doc Date-Time	Given - Reason	Site	User
HYDROMORPHONE Inj 1 mg/1 mL Amp (Dilaudid Inj) IM/ONCE/ONE			
02/25/15-0400	1 MG	1 MG	
02/25/15-0421	Y		Cameron, Johnnie
IM Injection Site: Right Dorsal Gluteal			
Pain Scale Used: Verbal Numeric (0-10)			
Pain Location Modifier:			
Right			
Pain Location: Hand			
Pain Description:			
Throbbing			
Pain Intensity: 10			
<u>Reassessments:</u>			
02/25/15-0451			
02/25/15-0451	Y		Cameron, Johnnie
Pain Scale Used: Verbal Numeric (0-10)			
Pain Location Modifier:			
Left			
Pain Location: Hand			
Pain Description:			
Aching			
Pain Intensity: 2			
Patient Reports Pain Level Controlled Or Tolerable: Y			

**Acknowledgements**

Ack Date-Time User  
 02/25/15-0421 Cameron, Johnnie

**Ondansetron 4 mg Orally-Disintegrating Tab (Zofran ODT) PO/ONCE/ONE**

02/25/15-0400 4 MG 4 MG  
 02/25/15-0421 Y

Cameron, Johnnie

**Acknowledgements**

Ack Date-Time User  
 02/25/15-0421 Cameron, Johnnie

**Insulin Regular 1 unit/0.01 mL (HumuLIN R) SUBCUT/ONCE/ONE**

02/25/15-0455 15 UNIT 15 UNIT  
 02/25/15-0516 Y

Cameron, Johnnie

Blood Glucose: 418  
 Subcutaneous Injection Site: Right Posterior Arm

**Acknowledgements**

Ack Date-Time User  
 02/25/15-0516 Cameron, Johnnie

**HYDROMORPHONE Inj 1 mg/1 mL Amp (Dilaudid Inj) IVP/ONCE/ONE**

02/25/15-0605 1 MG 1 MG

GUTIERREZ, CYNTHIA  
 Age/Sex 33/F DOB 07/31/1981  
 Status DEP ER

Acct# SV0083448385

Unit# SM02706496



000233

SRMH(2) 27626

DATE: 03/27/15 @ 0023  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 10

## Santa Rosa Memorial

Patient: GUTIERREZ, CYNTHIA      02/25/15 0341 Room      Acct# SV0083448385  
 Age/Sex 33/F      DOB 07/31/1981      Height 5 ft 3 in      Unit# SM02706496  
 Status DEP ER      Weight 56.000 kg      Dep'd 02/25/15 0702  
 ED.Phys Brandwene, Elliott L      PC.Phys Southwest Community, Health Cli

## Acknowledgements

Ack Date-Time

Doc Date-Time Given - Reason

Site

User

User

02/25/15-0622 Y

Cameron, Johnnie

Pain Scale Used: Verbal Numeric (0-10)

Pain Location: Hand

Pain Description:

Aching

Pain Intensity: 5

## Reassessments:

02/25/15-0652

02/25/15-0659 Y

Cameron, Johnnie

Pain Scale Used: Verbal Numeric (0-10)

Pain Intensity: 0

Patient Reports Pain Level Controlled Or Tolerable: Y

## Acknowledgements

Ack Date-Time

02/25/15-0622

User

Cameron, Johnnie

## LAB RESULTS

Test	Date	Time	Result	Reference	Units
WBC	2/25/15	0350	7.8	(3.5-11.0)	$10^3/\mu\text{L}$
RBC	2/25/15	0350	2.66 L	(3.50-5.50)	$10^6/\mu\text{L}$
HGB	2/25/15	0350	7.7 L	(12.0-15.0)	g/dL
HCT	2/25/15	0350	24.2 # L	(36.0-45.0)	%
MCV	2/25/15	0350	91 #	(79-95)	fL
MCH	2/25/15	0350	29.1	(26.0-33.0)	pg
MCHC	2/25/15	0350	32.0	(32.0-36.0)	g/dL
RDW	2/25/15	0350	16.3 H	(11.0-14.0)	%
PLT	2/25/15	0350	172	(120-400)	THD/uL
MPV	2/25/15	0350	9.4	(7.4-10.4)	fL
Neutrophils %	2/25/15	0350	73.4 H	(34-64)	%
Lymphocytes %	2/25/15	0350	16.6 L	(19-48)	%
Monocytes %	2/25/15	0350	6.6	(3-9)	
Eosinophils %	2/25/15	0350	2.4	(0-7)	%
Basophils %	2/25/15	0350	1.0	(0-2)	%
Neutrophils #	2/25/15	0350	5.7 H	(2.5-5.6)	THD/uL
Lymphocytes #	2/25/15	0350	1.3	(0.8-3.5)	$10^3/\mu\text{L}$
Monocytes #	2/25/15	0350	0.5	(0.2-1.0)	THD/uL
Eosinophils #	2/25/15	0350	0.2	(0-0.5)	THD/uL
Basophils #	2/25/15	0350	0.1	(0-0.1)	THD/uL

GUTIERREZ, CYNTHIA

/Sex 33/F

DOB 07/31/1981

Acct# SV0083448385

Unit# SM02706496



Status DEP ER

SRMH(2) 27627

000234

DATE: 03/27/15 @ 0023  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 11

## Santa Rosa Memorial

Patient: GUTIERREZ, CYNTHIA      02/25/15 0341 Room      Acct# SV0083448385  
 Age/Sex 33/F      DOB 07/31/1981      Height 5 ft 3 in      Unit# SM02706496  
 Status DEP ER      Weight 56.000 kg      Dep'd 02/25/15 0702  
 ED.Phys Brandwene, Elliott L      PC.Phys Southwest Community, Health Cli

Test	Date	Time	Result	Reference	Units
Glucose	2/25/15	0350	418 (A) *H	(65-99)	mg/dL

(A) \*\*\*\*\* CRITICAL VALUE \*\*\*\*\*

CALLED AND READ BACK BY:

WALLACCA01 on 02/25/15 (0429), TO CAMERON/ED

NURSE \_\_\_\_\_ NOTIFIED DR. \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

(Completed on hard copy only)

IF DR. NOT NOTIFIED REASON: \_\_\_\_\_

See also (B), (C)

Na	2/25/15	0350	137	(136-144)	mmol/L
K	2/25/15	0350	4.9	(3.6-5.1)	mmol/L
Cl	2/25/15	0350	96	L (101-111)	mmol/L
CO2	2/25/15	0350	26	(22-32)	mmol/L
Anion Gap	2/25/15	0350	15.0	H (3.0-11.0)	
BUN	2/25/15	0350	57	H (8-20)	mg/dL
Creatinine	2/25/15	0350	3.9	H (0.40-1.00)	mg/dL
Calcium	2/25/15	0350	8.0	L (8.9-10.3)	mg/dL
TP	2/25/15	0350	6.8	(6.1-7.9)	gm/dL
Tbili	2/25/15	0350	3.3	L (3.5-4.8)	g/dL
Bili	2/25/15	0350	0.5 (B)	(0.3-1.2)	mg/dL

(B) --- 02/25/15 0756 ---

TBIL previously reported as:

&lt; 0.1 L mg/dL

AST	2/25/15	0350	27	(15-41)	IU/L
ALT	2/25/15	0350	93	H (14-54)	IU/L
Alk Phos	2/25/15	0350	290	H (32-91)	IU/L
Globulin	2/25/15	0350	3.5	(2.3-3.5)	gm/dL
GFR Non-Af Am	2/25/15	0350	14 (C)	L (>60)	ml/min

(C) See (D), (E)

(D) Results suggest Kidney Stage 5 per NKF/DOQI guidelines

(E)

\*\*Note: As of 04/21/14 the eGFR will be calculated using the CKD-EPI equation\*\*

GUTIERREZ, CYNTHIA

Age 33/F

Status DEP ER

DOB 07/31/1981

Acct# SV0083448385

Unit# SM02706496



000235

SRMH(2) 27628

DATE: 03/27/15 @ 0023  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 12

## Santa Rosa Memorial

Patient: GUTIERREZ, CYNTHIA      02/25/15 0341 Room      Acct# SV0083448385  
 Age/Sex 33/F      DOB 07/31/1981      Height 5 ft 3 in      Unit# SM02706496  
 Status DEP ER      Weight 56.000 kg      Dep'd 02/25/15 0702  
 ED.Phys Brandwene, Elliott L      PC.Phys Southwest Community, Health Cli

Test	Date	Time	Result	Reference	Units
GFR Af Am	2/25/15	0350	17 (F)	L (>60)	ml/min

(F) See (G), (H)

CKMB Rapid	2/25/15	0350	5.1	(0.6-6.3)	ng/mL
Rap Trop I	2/25/15	0350	< 0.05 (G)	(<0.05)	ng/mL

(G) 99% of normal subjects have values <0.04. The recommended threshold for acute MI is >0.40. Values between 0.04 and 0.39 often occur in patients with acute coronary syndromes and have been associated with an increased risk of coronary events.

Serial sampling is recommended to detect the temporal rise and fall of Troponin levels characteristic of an AMI. These values should be interpreted in the context of the patient's clinical presentation.

NOTE: These assays were performed using the Biosite Triage Meter. Reference ranges may be different.

GUTIERREZ, CYNTHIA  
Age/Sex 33/F  
Status DEP ER

DOB 07/31/1981

Acct# SV0083448385



Unit# SM02706496

000236

SRMH(2) 27629

DATE: 03/27/15 @ 0023  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 13

**Santa Rosa Memorial**

Patient: GUTIERREZ, CYNTHIA      02/25/15 0341 Room      Acct# SV0083448385  
 Age/Sex 33/F      DOB 07/31/1981      Height 5 ft 3 in      Unit# SM02706496  
 Status DEP ER      Weight 56.000 kg      Dep'd 02/25/15 0702  
 ED.Phys Brandwene, Elliott L      PC.Phys Southwest Community Health Cli

Test	Date	Time	Result	Reference	Units
BNPT	2/25/15	0350	> 5000 (H) *H	(0-100)	pg/mL

(H) POSITIVE

\*\*\*\*\* CRITICAL RESULT\*\*\*\*\*

CALLED AND BROADCAST TO CAMERON/EDE AT 0417, 02/25/15 BY LAB WALLACCA01.

NURSE \_\_\_\_\_ NOTIFIED DR. \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

(Completed on hard copy only)

IF DR. NOT NOTIFIED REASON: \_\_\_\_\_

BNP LEVEL ADDITIONAL INTERPRETATIONS

0-100 PG/ML Highly unlikely that patient's symptoms result from systolic or diastolic dysfunction.

101-200 PG/ML BNP greater than 100 pg/ml is considered positive and indicative of heart failure. LV

Dysfunction with no acute CHF=141 (+/-31).

Severe Right Heart Failure, Pulm HTN, or large Pulm Embolus may equal 100-200 pg/ml.

201-479 PG/ML Almost always Left Heart Failure. AMI with CHF may have elevated levels; Positive BNP should not be viewed as excluding a diagnosis of AMI.

Equal to or greater than 480 PG/ML

Patients who present with dyspnea and BNP level equal to or greater than 480 have a nearly 30-fold increased risk for a cardiac event in the next 6 months.

**ORDERS**

Ordered	Procedure Name	Ordering Provider	E-Signed
02/25/15 0335	CBC w/ Differential	Brandwene, Elliott L, ACT	Yes
02/25/15 0335	CMP Comp Metabolic Panel CMP	Brandwene, Elliott L, ACT	Yes
02/25/15 0335	Cardiac Panel Baseline	Brandwene, Elliott L, ACT	Yes
02/25/15 0335	XR Chest 1V Portable	Brandwene, Elliott L, ACT	Yes
02/25/15 0335	EKG/ ECG	Brandwene, Elliott L, ACT	Yes
02/25/15 0400	HYDROMorphone Inj (Dilaudid...)	Brandwene, Elliott L, ACT	Yes
02/25/15 0400	Ondansetron ODT (Zofran ODT)	Brandwene, Elliott L, ACT	Yes
02/25/15 0452	Insulin Regular (Humulin R)	Brandwene, Elliott L, ACT	Yes
02/25/15 0452	Insulin Regular (Humulin R)	Brandwene, Elliott L, ACT	N/A
02/25/15 0604	HYDROMorphone Inj (Dilaudid...)	Brandwene, Elliott L, ACT	Yes
02/25/15 0808	Glucose Bedside	Brandwene, Elliott L, ACT	N/A

**DEPARTURE****Primary Impression:**

ESRD (end stage renal disease) on dialysis

GUTIERREZ, CYNTHIA  
Age 33/F  
Status DEP ER

DOB 07/31/1981

Acct# SV0083448385

Unit# SM02706496



SRMH(2) 27630

000237

DATE: 03/27/15 @ 0023  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 14

## Santa Rosa Memorial

Patient: GUTIERREZ, CYNTHIA      02/25/15 0341 Room      Acct# SV0083448385  
 Age/Sex 33/F      DOB 07/31/1981      Height 5 ft 3 in      Unit# SM02706496  
 Status DEP ER      Weight 56.000 kg      Dep'd 02/25/15 0702  
 ED.Phys Brandwene, Elliott L      PC.Phys Southwest Community, Health Cli

## Secondary Impressions:

Chronic pain  
 Anemia  
 Neuropathy  
 Poorly controlled diabetes mellitus  
**Disposition:** Discharge Home

Departure Date/Time: 02/25/15 - 0702

## Comment:

Condition: Stable

## Referrals:

Southwest Community, Health Cli  
 751 Lombardi Ct  
 Santa Rosa, CA 95407  
 Phone: 707-547-2222      Fax: 707-547-2229

Pt Instructions: AFTERCARE, ED Chronic Pain, ED Chronic Renal Failure, Diabetic Neuropathy

## Additional Instructions:

Please follow up at dialysis as scheduled tomorrow, and return to the emergency department sooner for worsening symptoms or any other concerns.

## Care Plan:

Arture Forms:

## Departure Screen :

## PRESCRIPTIONS

Prescription/Reported Meds	Type	Issued	Provider	Entered
HYDROCODONE BIT/ACETAMINOPHEN (NORCO 10-325 TABLET) Mg/325 Mg Tab 1 TAB PO Every 6 Hours As needed for PAIN, Moderate to Severe(4-10), #20 TAB	10 Rx	02/25/15	BRAEL001	02/25/15

## CARE PROVIDERS

## Staff History:

ED Physician:  
 02/25/15 0334 Brandwene, Elliott L, ACT  
 Practitioner:  
 Nurse:  
 02/25/15 0502 Cameron, Johnnie, RN

GUTIERREZ, CYNTHIA

Age 33/F      DOB 07/31/1981  
 Status DEP ER

Acct# SV0083448385

Unit# SM02706496



000238

SRMH(2) 27631

268

TRIAGE TIME 0726	ROOM 25	EXAM RM TIME 0728	COMPUTER OUT	ACUITY LEVEL 1 2 3 4 5	MODE OF ARRIVAL MEDICS UNIT#	WALKED	W/C	CARRIED OTHER	STRETCHER				
IEF COMPLAINT Cardiac arrest					PAIN	NOW _____/10	MAX _____/10	TIGHTNESS	BURNING				
					FLACC	_____/10	NIPS _____/7	PRESSURE	ACHING				
					RADIATION	SHARP/STABBING			THROBBING				
LAST VISIT then DC cont'd. in waiting room INTERVENTION PTA 2 mg dilaudid, 4 mg Zofran, 1 units Humuline					SPINAL PRECAUTIONS			R.N. SIG					
TIME:	INITIALS:	NURSING ASSESSMENT					= pos	/	= neg				
NEUROLOGIC <input type="checkbox"/> N/A Alert / Verbal / Pain Unresponsive Oriented to: Person / Place / Time / Event None / Age Appropriate Cooperative / Agitated / Anxious Combative / Lethargic / Aphasic Cry Vigorous Weak Hi pitch Weakness / Numbness UE/LE R/L Ms Tone WNL Hypo Hyper Art Font Soft/Flat Sunk Bulg		CARDIOVASCULAR <input type="checkbox"/> N/A Pink Pale / Flushed Warm / Cool Dry / Moist / Diaphoretic JVD / Pedal Edema Pulses _____ Rhythm PEA/rate 38		RESPIRATORY <input type="checkbox"/> N/A Regular / Irregular Labored / Unlabored Clear R / L / Bilat Crackles <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Rhonchi <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Wheezes <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Diminished <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Absent <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> Stridor Grunting Nasal Flaring / Retractions Cough Nonprod / Prod		ABDOMEN / GU <input type="checkbox"/> N/A B/S Present / Absent Soft / Firm Non-tender / Tender Distended <input type="checkbox"/> N/V/D / Constipated Urinary Δ Dysuria Vag. Bleed / Discharge Jaundice		MUSCULOSKELETAL <input type="checkbox"/> N/A CSM Intact / Baseline / MAEW Deformity / Abnormal Gait Laceration Bldg _____ Rash / Burn / Abrasion Discolored Ear Pulling R L Pain R L					
BP 212 128	P 150	R 52	PULSE OX 99.4	O <sub>2</sub> / RA 99.4	T ax	ORAL RECTAL TEMPORAL	VISUAL AC <input type="checkbox"/> CR <input type="checkbox"/> UNC 20/	OD	OS	OU	LMP	PREG	LACT
SCREENINGS FOR: TB FALL RISK ISO SUICIDE ABUSE _____ Leaving Barriers _____		PMHx None HTN MI Stent Dysrhy HF PPM / AICD CABG Asthma COPD Pneu Renal Failure Dialysis Kidney Dis Migraine TIA CVA Trauma Alz/Dementia Seizure NIDDM IDDM Thyroid GERD PUD Pancreatitis Liver Dis Psych Appy Chole Hyster Hepatitis HIV CA Recent Inf Soc Hx ETOH Rec Drugs Smoker PPD Lives Alone											
TIME 0727	IV #1 # Attempts		TIME	IV #2 # Attempts		TIME 0728	ENDOTRACHEAL TUBE INSERTED BY Lauterbach		VENTILATOR MODE ACDC RATE 14				
DISCONTINUED CATH INTACT <input type="checkbox"/>	DISCONTINUED CATH INTACT <input type="checkbox"/>		SIZE 20g	INIT SITE SIZE		SIZE 9.0ett/24	/CM LIPS	FIO <sub>2</sub> 100	Vt 400				
INIT MM SITE (R)AC SIZE 20g	INIT SITE SIZE		PLACEMENT CONFIRMED ETCO <sub>2</sub>		PEEP 5	PS							
IV FLUIDS													
TIME	BAG #	VOLUME TYPE	BOLUS TIME	RATE	RN INIT	VOL INFUSED	TIME DONE	TIME 0729 NASOGASTRIC TUBE					
								INSERTED BY Deb Bishop					
								SIZE 18 PLACEMENT ✓					
								COLOR reddish/brown					
								GUIAC: + - RES VOL 20 COLOR yellow RES VOL					
INTAKE OUTPUT													
INTAKE	TYPE	AMOUNT	TIME	TYPE	AMOUNT	URINE DIP					PATIENT ID		
						Nitrates	Blood	Spec Gr	Initials	SV83448563			
						Urobil							
						CLEAN / CATH	Protein	Ketone					
TOTAL INTAKE ml		TOTAL OUTPUT ml		SRMH(2) 19670									

Santa Rosa Memorial Hospital   
ST. JOSEPH  
HEALTH SYSTEM

**PATIENT CARE RECORD**  
EMERGENCY DEPARTMENT

CAT REG ER  
GUTIERREZ, CYNTHIA  
SM02706496 07/31/1981 33  
02/25/15 NSMED  
Lauterbach, Stewart A

000263

SRMH(2) 19670

MD TIME	ORDER SETS	TIME/INT	Rad / Int	MD TIME	RADIOLOGY	TIME/INT	Rad/INT	MD TIME	LABORATORY/OTHER	TIME/INT
	<input type="checkbox"/> Abd Pain < 50				<input type="checkbox"/> CXR Port PA/Lat				<input type="checkbox"/> CBC	
	<input type="checkbox"/> Abd Pain > 50 CT per MD ord				<input type="checkbox"/> C-Spine AP/Lat				<input type="checkbox"/> BMP	
	<input type="checkbox"/> Chest Pain < 30 PA/Lat				<input type="checkbox"/> Pelvis AP				<input type="checkbox"/> CMP	
	<input type="checkbox"/> Chest Pain > 30 <input type="checkbox"/> pCXR <input type="checkbox"/> PA/LAT				<input type="checkbox"/> Hip/Pelvis. R L				<input type="checkbox"/> BNP	
	<input type="checkbox"/> CVA CTH pCXR								<input type="checkbox"/> HCG: Quan Qual	
	<input type="checkbox"/> Sepsis Adult <input type="checkbox"/> pCXR <input type="checkbox"/> PA/LAT								<input type="checkbox"/> Lipase	
	<input type="checkbox"/> OD/Psych								<input type="checkbox"/> PT/INR	
	<input type="checkbox"/> Vag Bleed				<b>CT</b>				<input type="checkbox"/> D-Dimer	
	<input type="checkbox"/> Hip Fracture Hip/Pel pCXR				<input type="checkbox"/> Brain (NC) ALOC HA CVA				<input type="checkbox"/> Chlam/GC PCR	
	<input type="checkbox"/> Seizure, Afebr, Recur				<input type="checkbox"/> Chest: <input type="checkbox"/> Cont <input type="checkbox"/> NC				<input type="checkbox"/> Cardiac Markers	
	<input type="checkbox"/> GI Bleed				AO Dissec PE Trauma				<input type="checkbox"/> ABG	
	<input type="checkbox"/> Syncope > 35 <input type="checkbox"/> pCXR <input type="checkbox"/> PA/LAT				<input type="checkbox"/> Spine				<input type="checkbox"/> DSU	
	<input type="checkbox"/> Syncope < 35				<input type="checkbox"/> ABD/PEL				<input type="checkbox"/> Urine Clean Cath	
	<input type="checkbox"/> CSF Fluid				AAA Appy Stone Divertic				Dip UA C&S	
<b>OTHER ORDERS</b>				Remark:					<input type="checkbox"/> Bld Cult: 1 2 3	
				Contrast:	<input type="checkbox"/> None <input type="checkbox"/> IV <input type="checkbox"/> ORAL <input type="checkbox"/> 1 hour <input type="checkbox"/> 2 hour				<input type="checkbox"/> ECG + Rhythm Str	
									<input type="checkbox"/> Repeat ECG	
				<b>US</b>	<b>BBK</b>					
				<input type="checkbox"/> ABD:				Hold Clot		
				<input type="checkbox"/> Scrotal:				Type/Screen		
				<input type="checkbox"/> DVT: R L B				Type/Cross		
				<input type="checkbox"/> Pelvis:			(PC) x _____ Units			
				IUP Retain Prod Ovar Tors			(PLT) x _____ Units			
							(FFP) x _____ Units			
				<b>NOTES</b>	0742-Rs is 200 on bedside glucometer <i>Magnayen</i>	0745-Late entry - Patient was discharged this am and went out to waiting room. Pt. told staff she was going to sit in waiting room. Pt. then went into cardiac arrest. <i>Magnayen</i>				
				<input type="checkbox"/> Questionable diagnostic picture, delay in the diagnosis of pneumonia at the time of admission						
				MD CHART COMPLETE Y N	I have reviewed the patient's list of home medications to determine their impact on this visit. Any changes to those medications are reflected in the discharge instructions.					
				MD SIGNATURE	TIME	<input type="checkbox"/> TEMPLATE	<input type="checkbox"/> DICTATE #			
<b>PATIENT DISPOSITION:</b>		<b>DISCHARGE</b>	<input type="checkbox"/> HOME	<b>ADMIT</b>	<b>OTHER:</b>					
TIME _____		<input type="checkbox"/> OTHER _____	<input type="checkbox"/> REPORT TO _____	<input type="checkbox"/> TRANSFER TO: _____						
INITIALS _____		<input type="checkbox"/> VITALS/PAIN	<input type="checkbox"/> REPORT TIME _____	<input type="checkbox"/> EXPIRED						
WHEELCHAIR/AMBULATORY STRETCHER/CARRIED		<input type="checkbox"/> INSTRUCTIONS REC'D AND VERBALIZED UNDERSTANDING	<input type="checkbox"/> BELONGINGS LIST DONE	<input type="checkbox"/> CUSTODY	<input type="checkbox"/> MORTUARY					
		<input type="checkbox"/> INTERPRETER _____	<input type="checkbox"/> AMA	<input type="checkbox"/> SRMH MORGUE						
			<input type="checkbox"/> BEF/LWOT	<input type="checkbox"/> CORONER						

Initials	Signature	Initials	Signature
magnayen	<i>Magnayen</i>		

## PATIENT IDENTIFICATION

SV83448563

CAT REG ER  
**GUTIERREZ, CYNTHIA**  
 SM02706496 07/31/1981 33 F  
 02/25/18 NSMED  
 Lauterbach, Stewart A

02/25/18 NSMED

150 F

Pg  
of

		TIME	0740	0750	0750	0800	0815	0830				NURSING NOTES
CARDIAC	NIBP ABP	BP	212 128	210 114	160 86	160 96	159 85	145 77	/	/	/	0828 - Lisa from lab. Critical Lab RNP > 5000. Pt to CT- 0834 - Repeat to RN Nancy, pt to ICU Rm 208 from CT
	MAP			133	108	113	113	97				
	HR		150	152	111	103	94	88				
	RHYTHM		ST	ST	ST	ST	SR	SR				
RESP	RATE	52	28	14	14	16	14					
	O <sub>2</sub> SAT	100	100	100	100	100	100					
	RA NRM NC	Vent	Vent	Vent	Vent	Vent	Vent					
	L/min							V				
TEMP	ORAL TEMPORAL	99.4										
	RECTAL	99.4	ox									
		/10										
INNEURO	EYE	1	1	1	1	1	1					
	VERBAL	1	1	1	1	1	1					
	MOTOR	1	1	1	1	1	1					
	GCS	3	3	3	3	3	3	3				
PUPILS	R SIZE	3	3	3	3	3	3					
	RXN	Fixed	Fixed	Fixed	Fixed	Fixed	Fixed					
	L SIZE	4	4	4	4	4	4					
	RXN	Fixed	Fixed	Fixed	Fixed	Fixed	Fixed					
DRUGS	Propofol mg/kg/min	20										
OTHER	PUPIL SIZE: MM	0	2	3	4	5	6					
	GLASGOW COMA SCALE	4	3	2	1							
	EYE OPENING	SPONTANEOUS	TO SPEECH	TO PAIN	NONE							
	VERBAL	ORIENTED	CONFUSED	INAPP. WORDS	1 - NONE	2 - INCOMP.	4 - SOUNDS	5 - LOCALIZES	6 - OBEYS	3 - ABD. FLEXION	2 - EXT. RESPONSE	4 - WITHDRAWS
MOTOR												

TIME	PHYSICIAN ORDERS	TIME DONE	INIT	TREATMENT RESPONSE
0750	1 Propofol per protocol	0750	DB	20mg/kg/min
2				
3				
4				
5				
6				
7				
8				
9				
10				

All orders are a one time frequency, unless otherwise written. Ordered By: MD

Initials	Signature	Initials	Signature
WML	<i>Suzanne M. Lauterbach</i>	DB	<i>D. Bishop MD</i>



## PATIENT MONITORING RECORD

CAT REG ER  
GUTIERREZ, CYNTHIA  
SM02706496 07/31/1981 33  
02/25/15 NSMED F  
Lauterbach, Stewart A

SV83448563

00245

SRMH(2) 19672

TRIAGE TIME 3726	ROOM # 25	EXAM RM TIME 0728	COMPUTER OUT	ACUITY LEVEL 1 2 3 4 5	MODE OF ARRIVAL MEDICS UNIT#	WALKED	W/C	CARRIED OTHER	STRETCHER				
CHIEF COMPLAINT <u>Cardiac arrest</u>					PAIN NOW /10 FLACC /10 RADIATION	MAX /10 NIPS /7	TIGHTNESS PRESSURE SHARP/STABBING	BURNING ACHING THROBBING					
AM visit then D/C admit in waiting room INTERVENTION PTA 2mg dilaudid, 4mg Zofran, 15units Humulin R					□ SPINAL PRECAUTIONS		R.N. SIG <i>[Signature]</i>						
TIME	INITIALS:	NURSING ASSESSMENT					= pos	/	= neg				
NEUROLOGIC <input type="checkbox"/> N/A Alert / Verbal / Painful / Unresponsive Oriented to: Person / Place / Time / Event None / Age Appropriate Cooperative / Agitated / Anxious Combative / Lethargic / Aphasic Cry Vigorous Weak Hi pitch. Weakness / Numbness		CARDIOVASCULAR <input type="checkbox"/> N/A Pink / Pale / Flushed Warm / Cool Dry / Moist / Diaphoretic JVD / Pedal Edema Pulses Rhythm <i>PEA/rate 38</i> Cap Refill Heart Sounds		RESPIRATORY <input type="checkbox"/> N/A Regular / Irregular Labored / Unlabored Clear / Crackles <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Rhonchi <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Wheezes <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Diminished <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Absent <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Stridor Grunting Nasal Flaring / Retractions Cough Nonprod / Prod		ABDOMEN / GU <input type="checkbox"/> N/A B.S. Present / Absent Soft / Firm Non-tender / Tender Distended N/V / D / Constipated Urinary $\Delta$ Dysuria Vag. Bleed / Discharge Jaundice		MUSCULOSKELETAL <input checked="" type="checkbox"/> N/A CSM Intact / Baseline / MABW Deformity / Abnormal Gait Laceration Bldg Rash / Burn / Abrasion Discolored Ear Pulling R L Pain R L					
BP 212 128	P 150	R 52	PULSE OX bag mask	O <sub>2</sub> / RA 99.4	T ax	ORAL RECTAL TEMPORAL	VISUAL AC: □ CR □ UNC 20/ 20/ 20/	OD	OS	OU	LMP	PREG	LAC
SCREENINGS FOR: TB FALL RISK ISO		PMHx None HTN MI		Stent Dysrhy		HF PPM / AICD CABG							
SUICIDE ABUSE		Asthma COPD Pneu		Renal Failure Dialysis		Kidney Dis Migraine TIA CVA Trauma							
Learning Barriers		Alz/Dementia Seizure		NIDDM IDDM Thyroid GERD PUD Pancreatitis Liver Dis									
LEP <input type="checkbox"/> INTERPRETER		Psych		Appy Chole Hyster Hepatitis HIV CA Recent Inf									
<input type="checkbox"/> STATED <input type="checkbox"/> MEASURED <input type="checkbox"/> ESTIMATED		WT. kg		IMMUNIZATIONS /TETANUS		Soc Hx ETOH Rec Drugs Smoker PPD Lives Alone							
TIME 0727	IV #1 # Attempts		TIME	# Attempts		TIME 0728	ENDOTRACHEAL TUBE		VENTILATOR MODE AC/DC				
DISCONTINUED CATH INTACT <input type="checkbox"/>		DISCONTINUED CATH INTACT <input type="checkbox"/>		INIT SITE SIZE		INSERTED BY <i>Lauterbach</i>	SIZE 8.0 eth/24 /CM LIPS		RATE 14				
INIT SITE <i>(RN)</i> CATH SIZE 20						PLACEMENT CONFIRMED <i>ETCO<sub>2</sub></i>	FIO <sub>2</sub> 100 Vt 400						
						EID <i>BS</i> RISE/FALL CXR	PEEP 5 PS						
IV FLUIDS		BOLUS		RATE RN INIT VOL INFUSED TIME DONE		TIME 0729	NASOGASTRIC TUBE		TIME 0815 URINARY CATHETER				
TIME	BAG #	VOLUME TYPE	TIME	VOLUME	INIT	SIZE 18	INSERTED BY <i>Deb Bishop</i>	APPEARANCE <input type="checkbox"/> CLEAR <input checked="" type="checkbox"/> CLOUDY <input type="checkbox"/> GROSS BLOOD					
						PLACEMENT ✓	COLOR <i>reddish/brown</i> RES VOL 20		COLOR <i>yellow</i> RES VOL				
							GUAIAC: + -		Leuko _____ pH _____ Bilirubin _____				
							URINE DIP		Nitrates _____ Blood _____ Glucose _____				
							Urobilin _____ Spec Gr _____		Initials _____				
INTAKE		TIME	TYPE	AMOUNT	OUTPUT	TOTAL OUTPUT mL		CLEAN / CATH					
TOTAL INTAKE mL													
SV83448563													

Santa Rosa Memorial Hospital   
ST. JOSEPH  
HEALTH SYSTEM

PATIENT CARE RECORD  
EMERGENCY DEPARTMENT

## PATIENT IDENTIFICATION

CAT REG ER  
GUTIERREZ, CYNTHIA  
SM02706496 07/31/1981 33  
02/25/15 NSMED  
Lauterbach, Stewart A

MD TIME	ORDER SETS	TIME/INT	Rad / Int	MD TIME	RADIOLOGY	TIME/INT	Rad/INT	MD TIME	LABORATORY/OTHER	TIME/INT																																										
	<input type="checkbox"/> Abd Pain < 50				<input type="checkbox"/> CXR: Port PA/Lat				<input type="checkbox"/> CBC																																											
	<input type="checkbox"/> Abd Pain > 50 CT per MD ord				<input type="checkbox"/> C-Spine AP/Lat				<input type="checkbox"/> BMP																																											
	<input type="checkbox"/> Chest Pain < 30 PA/Lat				<input type="checkbox"/> Pelvis AP				<input type="checkbox"/> CMP																																											
	<input type="checkbox"/> Chest Pain > 30 <input type="checkbox"/> pCXR <input type="checkbox"/> PA/LAT				<input type="checkbox"/> Hip/Pelvis: R L				<input type="checkbox"/> BNP																																											
	<input type="checkbox"/> CVA CTH pCXR								<input type="checkbox"/> HCG: Quan Qual																																											
	<input type="checkbox"/> Sepsis Adult <input type="checkbox"/> pCXR <input type="checkbox"/> PA/LAT								<input type="checkbox"/> Lipase																																											
	<input type="checkbox"/> OD/Psych								<input type="checkbox"/> PT/INR																																											
	<input type="checkbox"/> Vag Bleed								<input type="checkbox"/> D-Dimer																																											
	<input type="checkbox"/> Hip Fracture Hip/Pel pCXR				<input type="checkbox"/> Brain (NC): ALOC HA CVA				<input type="checkbox"/> Chlam/GC PCR																																											
	<input type="checkbox"/> Seizure, Afeb, Recur				<input type="checkbox"/> Chest: <input type="checkbox"/> Cont <input type="checkbox"/> NC				<input type="checkbox"/> Cardiac Markers																																											
	<input type="checkbox"/> GI Bleed				AO Dissec PE Trauma				<input type="checkbox"/> ABG																																											
	<input type="checkbox"/> Syncope > 35 <input type="checkbox"/> pCXR <input type="checkbox"/> PA/LAT				<input type="checkbox"/> Spine				<input type="checkbox"/> DSU																																											
	<input type="checkbox"/> Syncope < 35				<input type="checkbox"/> ABD/PEL				<input type="checkbox"/> Urine: Clean Cath																																											
	<input type="checkbox"/> CSF Fluid								Dip UA C&S																																											
<b>OTHER ORDERS</b>																																																				
Remark: _____																																																				
Contrast: <input type="checkbox"/> None <input type="checkbox"/> IV <input type="checkbox"/> ORAL <input type="checkbox"/> 1 hour <input type="checkbox"/> 2 hour																																																				
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="3" style="text-align: center;">US</th> <th colspan="3" style="text-align: center;">BBK</th> </tr> </thead> <tbody> <tr> <td style="width: 50px;"><input type="checkbox"/> ABD:</td> <td style="width: 50px;"><input type="checkbox"/> Scrotal:</td> <td style="width: 50px;"><input type="checkbox"/> DVT: R L B</td> <td style="width: 50px;"><input type="checkbox"/> Pelvis:</td> <td style="width: 50px;"><input type="checkbox"/> IUP Retain Prod Ovar Tors</td> <td style="width: 50px;"><input type="checkbox"/> Hold Clot</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td>Type/Screen</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td>Type/Cross</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td>(PC) x _____ Units</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td>(PLT) x _____ Units</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td>(FFP) x _____ Units</td> </tr> </tbody> </table>											US			BBK			<input type="checkbox"/> ABD:	<input type="checkbox"/> Scrotal:	<input type="checkbox"/> DVT: R L B	<input type="checkbox"/> Pelvis:	<input type="checkbox"/> IUP Retain Prod Ovar Tors	<input type="checkbox"/> Hold Clot						Type/Screen						Type/Cross						(PC) x _____ Units						(PLT) x _____ Units						(FFP) x _____ Units
US			BBK																																																	
<input type="checkbox"/> ABD:	<input type="checkbox"/> Scrotal:	<input type="checkbox"/> DVT: R L B	<input type="checkbox"/> Pelvis:	<input type="checkbox"/> IUP Retain Prod Ovar Tors	<input type="checkbox"/> Hold Clot																																															
					Type/Screen																																															
					Type/Cross																																															
					(PC) x _____ Units																																															
					(PLT) x _____ Units																																															
					(FFP) x _____ Units																																															
<p><b>NOTES</b> 0742-BS is 200 on bedside glucometer. <i>7/23/15</i></p> <p>0745 - Late entry - Patient was discharged this am and went out to waiting room. Pt. told staff she was going to sit in waiting room. Pt. then went into cardiac arrest. <i>7/23/15</i></p>																																																				
<input type="checkbox"/> Questionable diagnostic picture, delay in the diagnosis of pneumonia at the time of admission																																																				
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;">MD CHART COMPLETE</td> <td colspan="9" style="padding: 5px;">I have reviewed the patient's list of home medications to determine their impact on this visit. Any changes to those medications are reflected in the discharge instructions.</td> </tr> <tr> <td style="text-align: center;">Y N</td> <td colspan="9" style="text-align: center;">MD SIGNATURE</td> </tr> <tr> <td></td> <td colspan="9" style="text-align: right;">TIME <input type="checkbox"/> TEMPLATE <input type="checkbox"/> DICTATE # _____</td> </tr> </table>											MD CHART COMPLETE	I have reviewed the patient's list of home medications to determine their impact on this visit. Any changes to those medications are reflected in the discharge instructions.									Y N	MD SIGNATURE										TIME <input type="checkbox"/> TEMPLATE <input type="checkbox"/> DICTATE # _____																				
MD CHART COMPLETE	I have reviewed the patient's list of home medications to determine their impact on this visit. Any changes to those medications are reflected in the discharge instructions.																																																			
Y N	MD SIGNATURE																																																			
	TIME <input type="checkbox"/> TEMPLATE <input type="checkbox"/> DICTATE # _____																																																			
<b>PATIENT DISPOSITION:</b> TIME <i>7/23/15</i> INITIALS <i>X CH</i> WHEELCHAIR/AMBULATORY STRETCHER/CARRIED		<b>DISCHARGE</b> <input type="checkbox"/> HOME <input type="checkbox"/> OTHER <input type="checkbox"/> VITALS/PAIN <input type="checkbox"/> INSTRUCTIONS REC'D AND VERBALIZED UNDERSTANDING <input type="checkbox"/> INTERPRETER _____		<b>ADMIT</b> TO _____ REPORT TO _____ REPORT TIME _____ <input type="checkbox"/> BELONGINGS LIST DONE		<b>OTHER:</b> <input type="checkbox"/> TRANSFER TO: _____ <input type="checkbox"/> CUSTODY <input type="checkbox"/> EXPIRED <input type="checkbox"/> AMA <input type="checkbox"/> MORTUARY <input type="checkbox"/> BEF/LWOT <input type="checkbox"/> SRMH MORGUE <input type="checkbox"/> CORONER																																														
Initials	Signature	Initials	Signature	PATIENT IDENTIFICATION																																																
<i>MM</i>	<i>7/23/15</i>			SV83448563																																																
CAT REG ER <b>GUTIERREZ, CYNTHIA</b> SM02706496 07/31/1981 33 F 02/25/15 NSMED Lauterbach, Stewart A 02/25/15 NSMED																																																				

Santa Rosa Memorial Hospital   
**ST JOSEPH**  
 HEALTH SYSTEM

Pg \_\_\_\_\_ of \_\_\_\_\_

NURSING NOTES											
CARDIAC	NIBP	ABP	BP	22	210	140	160	154	145		
				128	119	86	96	85	77		
	MAP				133	108	113	113	97		
	HR				150	152	111	103	94	88	
	RHYTHM				ST	ST	ST	ST	SR	SR	
RESP	RATE			52	28	14	14	16	14		
	O <sub>2</sub> SAT			100	100	100	100	100	100		
	RA NRM NC	L/min		Vent	Vent	Vent	Vent	Vent	Vent		
TEMP	ORAL TEMPORAL RECTAL			94.4	94.4						
PAIN	/10										
NEURO	EYE			1	1	1	1	1	1		
	VERBAL			1	1	1	1	1	1		
	MOTOR			1	1	1	1	1	1		
	GCS			3	3	3	3	3	3		
PUPILS	R SIZE			3	3						
	RXN			fixed	fixed						
	L SIZE			4	4						
	RXN			fixed	fixed						
OTHER IV DRIPS	Propofol mg/kg/min			20							
PUPIL SIZE: MM	0 2 3 4 5 6	GLASGOW COMA SCALE		EYE OPENING		VERBAL		MOTOR			
				4 - SPONTANEOUS	5 - ORIENTED	2 - INCOMP.	6 - OBEYS	3 - ABD. FLEXION			
				3 - TO SPEECH	4 - CONFUSED	SOUNDS	5 - LOCALIZES	2 - EXT. RESPONSE			
				2 - TO PAIN	3 - INAPP. WORDS	1 - NONE	4 - WITHDRAWS	1 - NONE			
				1 - NONE							
TIME	PHYSICIAN ORDERS				TIME DONE	INIT	TREATMENT RESPONSE				
0750	1 Propofol per protocol				0750	AB	20mg/kg/mi.				
2											
3											
4											
5											
6											
7											
8											
9											
10											
All orders are a one time frequency, unless otherwise written.											
Ordered By: <i>[Signature]</i> MD											
Initials	Signature				Initials	Signature					
MM	<i>[Signature]</i>				DB	<i>[Signature]</i>					

b. fch  
**Santa Rosa Memorial Hospital**  
 ST JOSEPH  
 HEALTH SYSTEM

PATIENT MONITORING RECORD

000248

CAT REG ER  
 GUTIERREZ, CYNTHIA  
 SM02706496 07/31/1981 33  
 02/25/15 NSMED F  
 Lauterbach, Stewart  
 SRMH(2) 19676

SV83448563

**CODE BLUE RECORD**

SRMH(2) 19692

000249

**Santa Rosa Memorial Hosp.**

1165 Montgomery Dr  
Santa Rosa, CA 95405  
707-546-3210

**MRN#:** SM02706496  
**Patient:** GUTIERREZ,CYNTHIA  
**Report Status:** Signed  
**Documented By:** LAUST001  
**Documented Date:** 02/25/15 0742

**Account#:** SV0083448563  
**Report Type:** EDPHYRPT  
**Report Mnemonic:** PHY.ER  
**Report#:** 0225-0094  
**Facility:** NSM

**Emergency Department Report**

**\*\*\*ADDENDUM\*\*\***

02/26/15

Addendum: Lauterbach,Stewart A on 2/26/15 @ 11:10

I failed to note in the note below that this patient immediately after the patient was intubated, a large piece of food was aspirated from the ET tube. This was removed by Dan, our respiratory therapist. I question if she could have had an aspiration leading to hypoxia, and the collapse.

***This Addendum is not considered FINAL until Signed by a Physician***

Authenticated By:  
<Electronically signed by Stewart A Lauterbach MD> 02/26/15 1113

Lauterbach, Stewart A MD

CC:

**History of Present Illness**

**HPI**

**Service date**

2/25/15

**Time Seen by MD:** 07:41

**Chief complaint:** full arrest, refer to code record

This is a 33y/o female that was seen here overnight in the ER, discharged this morning. She was sitting out in the waiting room when a patient's family member noticed she looked unresponsive. ER staff responded immediately and started CPR. Patient has a known history of ESRD. HPI is otherwise limited secondary to patient condition.

**Location:** hospital

**Onset/Duration/Timing:** started approximately - 0720 this morning

**Related symptoms:** : - unknown

**Past Medical History**

**Coded Allergies:**

No Known Allergies (Unverified , 2/25/15)  
per huisband, no known allergies

**Patient:** GUTIERREZ,CYNTHIA

**Adm Phys:** Kang,Hyun

**MRN#:** SM02706496

**Santa Rosa Memorial Hosp.**

1165 Montgomery Dr  
Santa Rosa, CA 95405  
707-546-3210

**Active Scripts**

Hydrocodone Bit/Acetaminophen (Norco 10-325 Tablet)10 Mg/325 Mg Tab1 Tab PO Q6HR PRN (PAIN, Moderate to Severe(4-10)) #20 TAB

Prov:Brandwene,Elliott L 2/25/15

Oxycodone Hcl/Acetaminophen (Percocet 10-325 Mg Tablet)1 Each Tablet1 Tab PO Q4HR #10 TAB

Prov:Brandwene,Elliott L 2/6/15

Hydrocodone Bit/Acetaminophen (Norco 5-325 Tablet)5 Mg/325 Mg Tab1-2 Tab PO Q6H PRN (PAIN, Moderate to Severe(4-10)) #15 TAB

Prov:Allred,Kendall S 2/1/15

Metoclopramide Hcl (Reglan)10 Mg Tab10 Mg PO ACHS #120 TAB Ref 3

Prov:Altaf,Mujeeb 1/22/15

Hydrocodone Bit/Acetaminophen (Norco 5-325 Tablet)5 Mg/325 Mg Tab1 Tab PO Q6H PRN (PAIN, Mild (1-3)) #30 TAB Ref 0

Prov:Quang,Angela M 1/16/15

Amlodipine Besylate (Norvasc)5 Mg Tab5 Mg PO DAILY 30 Days

Prov:Junck,Daniel L 1/5/15

Atorvastatin Calcium (Lipitor)20 Mg Tab20 Mg PO QPM #30 TAB Ref 0

Prov:Quang,Angela M 12/17/14

Furosemide (Lasix)80 Mg Tablet80 Mg PO DAILY #30 TAB

Prov:Altaf,Mujeeb 12/3/14

Ondansetron (Zofran Odt)4 Mg Tab.rapidis4 Mg PO BID PRN (NAUSEA/VOMITING) #10 TAB

Prov:Muller,Ridgely O 11/2/14

**Reported Medications**

Hydralazine Hcl 50 Mg Tablet50 Mg PO BID #120 TAB

1/13/15

Metoprolol Tartrate 100 Mg Tablet100 Mg PO BID #60 TAB

TO TAKE AM OF SURGERY

1/13/15

Brimonidine Tartrate (Brimonidine Tartrate 0.2%)5 MI Drops1 Drop BOTH EYES TID #5 ML

6/7/14

Timolol Maleate (Timolol Maleate Ophth Soln 0.5%)10 MI Drops1 Drop BOTH EYES BID #10 ML

6/7/14

Latanoprost 2.5 MI Drops1 Drop BOTH EYES QPM #2.5 ML

6/7/14

**Travel History**

Travel and/or hospitalization outside the US in the last 30 days?

Past medical records: reviewed

Endocrine history: DM type 2, hypothyroidism

Renal history: renal failure, dialysis

Other pertinent history: chronic pain

Family history of: DM

Smoking Status: Never A Smoker

History Of Substance Abuse: No

**Review of systems**

ROS unobtainable due to: acuity of condition

**Physical Exam**

**Exam**

**Vital signs**

Initial Vital Signs

**Patient:** GUTIERREZ,CYNTHIA

**Adm Phys:** Kang,Hyun

**MRN#:** SM02706496

**Santa Rosa Memorial Hosp.**

1165 Montgomery Dr  
 Santa Rosa, CA 95405  
 707-546-3210

Date Time	Temp	Pulse	Resp	B/P	Pulse Ox	O2 Delivery	O2 Flow Rate	FiO2
2/25/15 08:16		116			100			100
2/25/15 08:45	97.7		14	126/63		Ventilator		

**Exam limitations:** clinical condition

**General appearance:** unresponsive, : - uremic frost

**Head/ENT:** atraumatic, no airway obstruction

**Respiratory:** lungs clear - after intubation, no spontaneous respirations

**Cardiovascular:** : - pulseless rhythm

**Abdomen:** soft, no distention

**Extremities:** no signs of trauma

**Neurologic:** unresponsive

**Glasgow Coma Scale**

**Eye opening:** 1=none

**Verbal response:** 1=none

**Motor response:** 1=no response

**Data****Vital Signs**

Date Time	Temp	Pulse	Resp	B/P	Pulse Ox	O2 Delivery	O2 Flow Rate	FiO2
2/25/15 08:45	97.7	88	14	126/63	100	Ventilator		40
2/25/15 08:16		116			100			100

**Medications Administered**

Given in ED

**Medications Administered**

Medications (Trade)	Dose Ordered	Sig/Sch	Start Time Stop Time	Status	Last Admin Dose Admin
Pantoprazole Sodium/Sodium Chloride (Protonix Inj/ Normal Saline)	100ml @ 10 mls/hr	Q10H	2/25/15 08:10		2/26/15 04:41 10 MLS/HR
Propofol	100ml @ 0 mls/hr	Q0M PRN	2/25/15 08:08		2/26/15 08:21 0 MLS/HR

**Diagnostics & Interpretation****X-RAY (Interpreted by EP) :**

Read by: Radiologist

X-RAY type: chest

# of views: 1

X-RAY positive findings: : - et low - called nurse - inc dens infilts lll, rul, rll.. stable cm, rt jug

CT :

CT findings

Head - negative acute

**Patient:** GUTIERREZ,CYNTHIA

**Adm Phys:** Kang,Hyun

**MRN#:** SM02706496

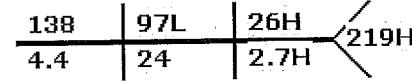
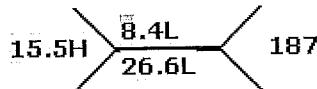
**Santa Rosa Memorial Hosp.**

1165 Montgomery Dr  
 Santa Rosa, CA 95405  
 707-546-3210

**Result Diagram:**

2/26/15 0614

2/26/15 0614

**Lab Results****Laboratory Tests**

Test	2/25/15 07:41	2/25/15 07:47	2/25/15 07:50	2/25/15 08:48
POC Glucose	200 H mg/dL (65-99)			101 H mg/dL (65-99)
WBC		12.2 H $10^3/\mu\text{L}$ (3.5-11.0)		
RBC		2.78 L $10^6/\mu\text{L}$ (3.50-5.50)		
Hgb		8.1 L g/dL (12.0-15.0)		
Hct		26.0 L % (36.0-45.0)		
MCV		93 fL (79-95)		
Plt Count		163 THD/ $\mu\text{L}$ (120-400)		
Manual Differential		Not Indicated		
Seg Neutrophils %		52.9 % (34-64)		
Lymphocytes %		36.3 % (19-48)		
Monocytes %		7.0 (3-9)		
Eosinophils %		2.2 % (0-7)		
Basophils %		1.6 % (0-2)		
Anisocytosis		2+		
PT		14.5 Sec. (11.9-14.8)		
INR		1.10 (0.6-1.4)		
PTT		25.8 SEC (23.0-36.3)		
Sodium		140 mmol/L (136-144)		
Potassium		4.3 mmol/L (3.6-5.1)		
Chloride		103 mmol/L (101-111)		
Carbon Dioxide		24 mmol/L (22-32)		
Anion Gap		13.0 H (3.0-11.0)		
BUN		60 H mg/dL (8-20)		
Creatinine		4.1 H mg/dL (0.40-1.00)		
Est GFR (African Amer)		16 L ml/min		

Patient: GUTIERREZ,CYNTHIA

Adm Phys: Kang,Hyun

MRN#: SM02706496

**Santa Rosa Memorial Hosp.**

1165 Montgomery Dr  
 Santa Rosa, CA 95405  
 707-546-3210

		(>60)	
Est GFR (Non-Af Amer)		13 L ml/min (>60)	
Glucose		210 H mg/dL (65-99)	
Lactic Acid		6.5 *H mmol/L (0.5-2.2)	
Calcium		9.8 mg/dL (8.9-10.3)	
Total Bilirubin		0.6 mg/dL (0.3-1.2)	
AST		42 H IU/L (15-41)	
ALT		94 H IU/L (14-54)	
Alkaline Phosphatase		266 H IU/L (32-91)	
Rapid CK-MB (CK-2)		6.4 H ng/mL (0.6-6.3)	
Rapid Troponin I		< 0.05 ng/mL (<0.05)	
Rap B-Natriuretic Pept		> 5000 *H pg/mL (0-100)	
Total Protein		6.5 gm/dL (6.1-7.9)	
Albumin		2.9 L g/dL (3.5-4.8)	
Globulin		3.6 H gm/dL (2.3-3.5)	
ABG pH		7.29 L (7.35-7.45)	
ABG pCO2		42.8 mmHg (32-45)	
ABG pO2		328.0 H mmHg (83-100)	
ABG pO2 at Pt Temp		328 H mmHG (83-100)	
ABG HCO3		20 L mmol/L (22-26)	
ABG O2 Saturation		100.0 H % (95-99)	
ABG Base Excess		-5.7 L (-2 to +2)	

**Medical Decision Making****Progress Notes****Progress Note :**

Date: Feb 25, 2015

Time: 07:45

**Note**

Dr. Kang (ICU) at bedside, he will admit pt

**Patient:** GUTIERREZ,CYNTHIA**Adm Phys:** Kang,Hyun**MRN#:** SM02706496

**Santa Rosa Memorial Hosp.**

1165 Montgomery Dr  
 Santa Rosa, CA 95405  
 707-546-3210

**Medical decision making/Course****Course**

This 33-year-old dialysis patient is extremely well known to us in the emergency department for numerous visits with nausea vomiting gastroparesis and also with a history of her multiple complications of diabetes was seen with nausea and vomiting last night. She was in good shape and the vomiting was brought under control and she was discharged as some many times previously. Her potassium was noted to be 4.9 in the department. She was discharged to the lobby and was apparently sitting there when she collapsed to the floor a code was called and our staff responded to the lobby to bring the patient back she's placed on a gurney and CPR started is no palpable pulses are detected she is placed in a critical care room him putting her on the gurney into the critical care room. CPR was continued she's intubated while the nurses are getting her hooked up to the monitors. On the cardiac monitor we see a narrow complex relatively bradycardic rhythm regular at perhaps 30. Given the critical nature of her dialysis port is accessed and her drugs are given via that route she's given calcium and bicarbonate based on the possibility of acute hyperkalemia. Is followed with epinephrine. On her initial ultrasound I can see valve motion within the heart but no significant wall motion. Following the epinephrine her heart rate speeds up and her contractility increases her blood pressure returns stopped and ultimately her heart rate is 150 slowly this drops back down to about 120. Her examination she is unresponsive she has the appearance of diabetes and renal failure, no pulses and agonal respiratory efforts. Dr.

Kang the intensivist is contacted and he comes down to see the patient and will admit her to the intensive care unit. The nephrologist are contacted.

**Procedures****Intubation**

**Time of Intubation:** 07:35

**Reason for Intubation:**

arrest

**Assessed for difficult airway:** Yes

**Intubation Method:** orotracheal

**Tube size:** 8.0

**Medications:** : - crash intubation

**Tube placement confirmation:** condensation in tube, equal chest rise, visualized going through cords

**Intubation complications:** none

**Post intubation xray:** position adjusted

**Critical Care**

**Critical care time:** 30-74 mins excluding procedures

**Critical care time**

This critical care time did not overlap with any other physicians or include procedures. During this critical care time, the patient was at high risk of life threatening or organ threatening decompensation.

**Disposition**

Latest vital signs

**Vital Signs**

	2/25/15 08:45
Temp	97.7
Pulse	88
Resp	14
B/P	126/63
Pulse Ox	100
O2 Delivery	Ventilator

**Patient:** GUTIERREZ,CYNTHIA

**Adm Phys:** Kang,Hyun

**MRN#:** SM02706496

**Santa Rosa Memorial Hosp.**

1165 Montgomery Dr  
Santa Rosa, CA 95405  
707-546-3210

FiO2	40
------	----

**Impression:**

**Primary Impression:** Cardiopulmonary arrest

**Additional Impression:** ESRD (end stage renal disease) on dialysis

**Condition:** Critical

**Disposition:** Admit Acute Inpt This Fac

**Admit to:** ICU

**Admitting provider:** Dr. Kang

**Attestation**

*Documentation prepared by Arnold, Christina M , acting as medical scribe for and in the presence of Dr. Lauterbach 2/25/15 08:08*

All medical record entries made by the scribe were at my direction and in my presence. I have reviewed the chart and agree that the record accurately reflects my personal performance of the history, physical exam, medical decision making, and the emergency department course for this patient. I have also personally reviewed and agree with the discharge instructions and disposition.

EMR and Dragon Attestation - this medical document was created using an electronic medical record system with Dragon computerized dictation system. Although this document has been carefully reviewed, there may still be some phonetic and typographical errors. These errors are purely typographical, due to imperfections of the software programs, and do not reflect any compromise in the patient's medical care.

Lauterbach,Stewart A  
Arnold,Christina M SCRIBE

Feb 25, 2015 07:42  
Feb 25, 2015 08:09

***This is not considered FINAL until Signed by a Physician***

Authenticated By:  
<Electronically signed by Stewart A Lauterbach MD> 02/26/15 0938

---

Stewart A Lauterbach

cc:

Patient: GUTIERREZ,CYNTHIA  
Adm Phys: Kang,Hyun  
MRN#: SM02706496

DATE: 02/25/15 @ 0927  
USER: EDM MNR

Northern California EDM \*LIVE\*  
ED Summary Report

PAGE 1

## Santa Rosa Memorial

Patient: GUTIERREZ, CYNTHIA  
Age/Sex 33/F DOB 07/31/1981  
Status ADM IN (NSMW268-01)  
ED.Phys Lauterbach, Stewart A

02/25/15 0754 Room S25  
Height 5 ft 2 in  
Weight 58.2 kg  
PC.Phys Southwest Community, Health Cli

Acct# SV0083448563  
Unit# SM02706496  
Dep'd 02/25/15 0837

## PATIENT DEMOGRAPHICS

3492 STONY POINT RD  
SANTA ROSA, CA 95407  
714-673-1287

Insurance: Partnership Managed Medicaid  
Next of Kin: HUERTA, JOSE  
Relation: Husband  
Phone: 714-673-1287

PCP: Southwest Community, Health Cli  
Family Doctor:  
Referring:

## GENERAL DATA

ED Physician: Lauterbach, Stewart A, ACT  
Practitioner:  
Nurse: Bishop, Deborah, RN

Arrival Date/Time: 02/25/15 - 0726  
Triage Date/Time: 02/25/15 - 0726  
Date of Birth: 07/31/1981

Stated Complaint: INDIA, A472/CARDIAC ARREST, RENAL FAILURE  
Chief Complaint: Arrest  
Priority: 1

## HISTORY OF PRESENT ILLNESS

02/25/15 0726 Bishop, Deborah

History Of Present Illness CODE BLUE FROM WR, SEE PAPER CHART

## ALLERGIES

Unable to Obtain

## HEIGHT &amp; WEIGHT

02/25/15 0835 Aquila, Deborah M  
Weight (Calculated Kilogram) 58.2  
Weight Source Bed Scale

02/25/15 0840 Aquila, Deborah M  
Height (Feet) 5  
Height (Inches) 2  
Height Measurement Method Estimated  
Weight (Calculated Kilogram) 58.2  
Weight Source Bed Scale

## PAST MEDICAL HISTORY

02/25/15 0812 Arnold, Christina M  
Dialysis Y  
Renal Failure Y  
Diabetes Mellitus Type 2 Y  
Hypothyroidism Y

GUTIERREZ, CYNTHIA  
/Sex 33/F  
Status ADM IN

DOB 07/31/1981

Acct# SV0083448563

Unit# SM02706496



000264

SRMH(2) 20171

DATE: 02/25/15 @ 0927  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 2

**Santa Rosa Memorial**

Patient: GUTIERREZ, CYNTHIA      02/25/15 0754 Room S25      Acct# SV0083448563  
 Age/Sex 33/F DOB 07/31/1981      Height 5 ft 2 in      Unit# SM02706496  
 Status ADM IN (NSMW268-01)      Weight 58.2 kg      Dep'd 02/25/15 0837  
 ED.Phys Lauterbach, Stewart A      PC.Phys Southwest Community, Health Cli

**ASSESSMENTS**02/25/15 0726 ED Adult Triage Assessment

Bishop, Deborah, RN

History Of Present Illness CODE BLUE FROM WR, SEE PAPER CHART  
 Traveled Or Hospitalized Outside USA In Last 30 Days No  
 Is Patient Female? Y  
 Currently Pregnant? N  
 Currently Breastfeeding? N  
 Priority 1 Resuscitation

02/25/15 0837 ED Adult Disposition Assessmnt

Bishop, Deborah, RN

Organ Dysfunction Criteria Present (Acute Only, Not Chronic) Altered LOC/Confusion  
 Admit Report Given To RN NANCY  
 Time Report Given 0835  
 Admission Destination ICU 268  
 Admission Mode Stretcher  
 Equipment Used To Transfer Patient IV, Cardiac Monitor, Oxygen, Other  
 Patient Accompanied By RN, RT  
 Patient Belongings Sent Y

02/25/15 0926 ED Patient Belongings

Bishop, Deborah, RN

Does Patient Have Belongings/Valuables Y  
 Performed On Admission  
 Not Transferred From ED  
 Unit Transferred To ICU RM 268  
 Dentures None  
 Partial(s) None  
 Contacts Len(s) None  
 Glasses None  
 Hearing Aids None  
 Clothing Slippers, Pants  
 Other Clothing SHIRTS AND BRA CUT OFF  
 Home Medication(s) None  
 Other Valuable(s) Cell Phone

**MEDICATIONS**

## Medication

Sch Date-Time	Ordered Dose	Admin Dose		
Doc Date-Time	Given - Reason	Site	User	
Pantoprazole Inj 80 MG in Sodium Chloride 0.9% 100 ML (Protonix Inj 80 MG in Normal Saline 1				

## Acknowledgements

Ack Date-Time  
02/25/15-0922User  
Sweet, Nancy LGUTIERREZ, CYNTHIA  
/Sex 33/F  
Status ADM IN

DOB 07/31/1981

Acct# SV0083448563

Unit# SM02706496



000265

SRMH(2) 20172

DATE: 02/25/15 @ 0927  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 3

## Santa Rosa Memorial

Patient: GUTIERREZ, CYNTHIA  
 Age/Sex 33/F DOB 07/31/1981  
 Status ADM IN (NSMW268-01)  
 ED.Phys Lauterbach, Stewart A

02/25/15 0754 Room S25 Acct# SV0083448563  
 Height 5 ft 2 in Unit# SM02706496  
 Weight 58.2 kg Dep'd 02/25/15 0837  
 PC.Phys Southwest Community, Health Cli

## LAB RESULTS

Test	Date	Time	Result	Reference	Units
WBC	2/25/15	1800	PENDING	(3.5-11.0)	$10^3/\mu\text{L}$
WBC	2/25/15	1200	PENDING	(3.5-11.0)	$10^3/\mu\text{L}$
WBC	2/25/15	0747	12.2 H	(3.5-11.0)	$10^3/\mu\text{L}$
RBC	2/25/15	1800	PENDING	(3.50-5.50)	$10^6/\mu\text{L}$
RBC	2/25/15	1200	PENDING	(3.50-5.50)	$10^6/\mu\text{L}$
RBC	2/25/15	0747	2.78 L	(3.50-5.50)	$10^6/\mu\text{L}$
HGB	2/25/15	1800	PENDING	(12.0-15.0)	g/dL
HGB	2/25/15	1200	PENDING	(12.0-15.0)	g/dL
HGB	2/25/15	0747	8.1 L	(12.0-15.0)	g/dL
HCT	2/25/15	1800	PENDING	(36.0-45.0)	%
HCT	2/25/15	1200	PENDING	(36.0-45.0)	%
HCT	2/25/15	0747	26.0 L	(36.0-45.0)	%
MCV	2/25/15	1800	PENDING	(79-95)	fL
MCV	2/25/15	1200	PENDING	(79-95)	fL
MCV	2/25/15	0747	93	(79-95)	fL
MCH	2/25/15	1800	PENDING	(26.0-33.0)	pg
MCH	2/25/15	1200	PENDING	(26.0-33.0)	pg
MCH	2/25/15	0747	29.2	(26.0-33.0)	pg
MCHC	2/25/15	1800	PENDING	(32.0-36.0)	g/dL
MCHC	2/25/15	1200	PENDING	(32.0-36.0)	g/dL
MCHC	2/25/15	0747	31.2 L	(32.0-36.0)	g/dL
RDW	2/25/15	1800	PENDING	(11.0-14.0)	%
RDW	2/25/15	1200	PENDING	(11.0-14.0)	%
RDW	2/25/15	0747	16.6 H	(11.0-14.0)	%
PLT	2/25/15	1800	PENDING	(120-400)	THD/uL
PLT	2/25/15	1200	PENDING	(120-400)	THD/uL
PLT	2/25/15	0747	163	(120-400)	THD/uL
MPV	2/25/15	1800	PENDING	(7.4-10.4)	fL
MPV	2/25/15	1200	PENDING	(7.4-10.4)	fL
MPV	2/25/15	0747	10.1	(7.4-10.4)	fL
Neutrophils %	2/25/15	1800	PENDING	(34-64)	%
Neutrophils %	2/25/15	1200	PENDING	(34-64)	%
Neutrophils %	2/25/15	0747	52.9	(34-64)	%
Lymphocytes %	2/25/15	1800	PENDING	(19-48)	%
Lymphocytes %	2/25/15	1200	PENDING	(19-48)	%
Lymphocytes %	2/25/15	0747	36.3	(19-48)	%
Monocytes %	2/25/15	0747	7.0	(3-9)	%
Eosinophils %	2/25/15	0747	2.2	(0-7)	%
Basophils %	2/25/15	0747	1.6	(0-2)	%
Neutrophils #	2/25/15	1800	PENDING	(2.5-5.6)	THD/uL
Neutrophils #	2/25/15	1200	PENDING	(2.5-5.6)	THD/uL
Neutrophils #	2/25/15	0747	6.5 H	(2.5-5.6)	THD/uL
Lymphocytes #	2/25/15	1800	PENDING	(0.8-3.5)	$10^3/\mu\text{L}$
Lymphocytes #	2/25/15	1200	PENDING	(0.8-3.5)	$10^3/\mu\text{L}$

GUTIERREZ, CYNTHIA  
 /Sex 33/F  
 DOB 07/31/1981  
 Status ADM IN

Acct# SV0083448563

Unit# SM02706496



000266

SRMH(2) 20173

DATE: 02/25/15 @ 0927  
USER: EDM MNR

Northern California EDM \*LIVE\*  
ED Summary Report

PAGE 4

## Santa Rosa Memorial

Patient: GUTIERREZ, CYNTHIA 02/25/15 0754 Room S25 Acct# SV0083448563  
Age/Sex 33/F DOB 07/31/1981 Height 5 ft 2 in Unit# SM02706496  
Status ADM IN (NSMW268-01) Weight 58.2 kg Dep'd 02/25/15 0837  
ED.Phys Lauterbach, Stewart A PC.Phys Southwest Community, Health Cli

Test	Date	Time	Result	Reference	Units
Lymphocytes #	2/25/15	0747	4.4	H	(0.8-3.5)
Monocytes #	2/25/15	0747	0.9		(0.2-1.0)
Eosinophils #	2/25/15	0747	0.3		(0-0.5)
Basophils #	2/25/15	0747	0.2	H	(0-0.1)
Slide Review	2/25/15	0747	<10% BANDS		
Man Diff	2/25/15	0747	(A)		

(A) Not Indicated

Anisocytosis 2/25/15 0747 2+  
PTT 2/25/15 0747 25.8 (B) (23.0-36.3) SEC

(B) Anti-Xa activity is the preferred alternate method to monitor heparin therapy.

As of Sept 2013, the following tests are now orderable:

## HEPARIN ANTI-Xa ACT, LOW MOLEC

HEPARIN ANTI-Xa ACT, UNFRACTION

PT	2/25/15	0747	14.5	(11.9-14.8)	Sec.
	2/25/15	0747	1.10	(0.6-1.4)	
Line Color	2/25/15	0731	PENDING	(Yellow)	
Ur Clarity	2/25/15	0731	PENDING	(Clear)	
Ur Spec Gravity	2/25/15	0731	PENDING	(1.005-1.030)	
Urine pH	2/25/15	0731	PENDING	(5.0-8.0)	
Urine Protein	2/25/15	0731	PENDING	(Negative)	mg/dL
Urine Glucose	2/25/15	0731	PENDING	(Negative)	mg/dL
Urine Ketones	2/25/15	0731	PENDING	(Negative)	mg/dL
Urine Bilirubin	2/25/15	0731	PENDING	(Negative)	
Urine Blood	2/25/15	0731	PENDING	(Negative)	
Urine Nitrite	2/25/15	0731	PENDING	(Negative)	
Ur Urobilinogen	2/25/15	0731	PENDING	(0.2-1.0)	mg/dL
Ur Leu Est	2/25/15	0731	PENDING	(Negative)	
UA Sp Desc	2/25/15	0731	PENDING		
Glucose	2/25/15	1800	PENDING	(65-99)	mg/dL
Glucose	2/25/15	1200	PENDING	(65-99)	mg/dL
Glucose	2/25/15	0747	PENDING	(70-130)	mg/dL
Na	2/25/15	1800	PENDING	(136-144)	mmol/L
Na	2/25/15	1200	PENDING	(136-144)	mmol/L
Na	2/25/15	0747	140	(136-144)	mmol/L
K	2/25/15	1800	PENDING	(3.6-5.1)	mmol/L
K	2/25/15	1200	PENDING	(3.6-5.1)	mmol/L
K	2/25/15	0747	4.3	(3.6-5.1)	mmol/L
Cl	2/25/15	1800	PENDING	(101-111)	mmol/L
Cl	2/25/15	1200	PENDING	(101-111)	mmol/L
Cl	2/25/15	0747	103	(101-111)	mmol/L

GUTIERREZ, CYNTHIA

/Sex 33/F  
Species ADM IN

DOB 07/31/1981

Acct# SV0083448563

Unit# SM02706496



DATE: 02/25/15 @ 0927  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 5

## Santa Rosa Memorial

Patient: GUTIERREZ, CYNTHIA      02/25/15 0754 Room S25      Acct# SV0083448563  
 Age/Sex 33/F DOB 07/31/1981      Height 5 ft 2 in      Unit# SM02706496  
 Status ADM IN (NSMW268-01)      Weight 58.2 kg      Dep'd 02/25/15 0837  
 ED.Phys Lauterbach, Stewart A      PC.Phys Southwest Community, Health Cli

Test	Date	Time	Result	Reference	Units
CO2	2/25/15	1800	PENDING	(22-32)	mmol/L
CO2	2/25/15	1200	PENDING	(22-32)	mmol/L
CO2	2/25/15	0747	24	(22-32)	mmol/L
Anion Gap	2/25/15	1800	PENDING	(3.0-11.0)	
Anion Gap	2/25/15	1200	PENDING	(3.0-11.0)	
Anion Gap	2/25/15	0747	13.0 H	(3.0-11.0)	
BUN	2/25/15	1800	PENDING	(8-20)	mg/dL
BUN	2/25/15	1200	PENDING	(8-20)	mg/dL
BUN	2/25/15	0747	PENDING	(8-26)	mg/dL
Creatinine	2/25/15	1800	PENDING	(0.40-1.00)	mg/dL
Creatinine	2/25/15	1200	PENDING	(0.40-1.00)	mg/dL
Creatinine	2/25/15	0747	PENDING	(0.44-1.00)	mg/dL
Calcium	2/25/15	1800	PENDING	(8.9-10.3)	mg/dL
Calcium	2/25/15	1200	PENDING	(8.9-10.3)	mg/dL
Calcium	2/25/15	0747	9.8	(8.9-10.3)	mg/dL
TP	2/25/15	0747	PENDING	(6.5-8.1)	gm/dL
Alb	2/25/15	0747	PENDING	(3.5-4.8)	g/dL
T Bili	2/25/15	0747	PENDING	(0.3-1.2)	mg/dL
AST	2/25/15	0747	PENDING	(15-41)	IU/L
ALT	2/25/15	0747	PENDING	(5-32)	IU/L
Phos	2/25/15	0747	PENDING	(32-91)	IU/L
Globulin	2/25/15	0747	PENDING	(2.6-3.1)	gm/dL
GFR Non-Af Am	2/25/15	1800	PENDING	(>60)	ml/min
GFR Non-Af Am	2/25/15	1200	PENDING	(>60)	ml/min
GFR Non-Af Am	2/25/15	0747	PENDING	(>60)	ml/min
Lactic Acid	2/25/15	0747	PENDING	(0.5-2.2)	mmol/L
CKMB Rapid	2/25/15	0747	6.4 (C) H	(0.6-6.3)	ng/mL

(C) \*\*\*\*\* CRITICAL VALUE \*\*\*\*\*

CALLED AND READ BACK BY:

AUTOINS on 02/25/15 (0820), TO []

NURSE \_\_\_\_\_ NOTIFIED DR. \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

(Completed on hard copy only)

IF DR. NOT NOTIFIED REASON: \_\_\_\_\_

GUTIERREZ, CYNTHIA

Acct# SV0083448563

Unit# SM02706496

/Sex 33/F

DOB 07/31/1981



Status ADM IN

000268

SRMH(2) 20175

DATE: 02/25/15 @ 0927  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 6

**Santa Rosa Memorial**

Patient: GUTIERREZ, CYNTHIA      Date: 02/25/15 0754 Room S25      Acct# SV0083448563  
 Age/Sex 33/F      DOB 07/31/1981      Height 5 ft 2 in      Unit# SM02706496  
 Status ADM IN (NSMW268-01)      Weight 58.2 kg      Dep'd 02/25/15 0837  
 ED.Phys Lauterbach, Stewart A      PC.Phys Southwest Community, Health Cli

Test	Date	Time	Result	Reference	Units
Rap Trop I	2/25/15	0747	< 0.05 (D)	(<0.05)	ng/mL
BNPT	2/25/15	0747	> 5000 (D) *H	(0-100)	pg/mL

(D) POSITIVE

\*\*\*\*\* CRITICAL RESULT\*\*\*\*\*

CALLED AND BROADCAST TO DEB, RN, ER AT 0825, 02/25/15 BY LAB CATHEYLI01.

NURSE \_\_\_\_\_ NOTIFIED DR. \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

(Completed on hard copy only)

IF DR. NOT NOTIFIED REASON: \_\_\_\_\_

BNP LEVEL ADDITIONAL INTERPRETATIONS

0-100 PG/ML Highly unlikely that patient's symptoms result from systolic or diastolic dysfunction.

101-200 PG/ML BNP greater than 100 pg/ml is considered positive and indicative of heart failure. LV

Dysfunction with no acute CHF-141 (+/-31).

Severe Right Heart Failure, Pulm HTN, or

large Pulm Embolus may equal 100-200 pg/ml.

201-479 PG/ML Almost always Left Heart Failure. AMI with

CHF may have elevated levels; Positive BNP

should not be viewed as excluding a diagnosis of AMI.

Equal to or greater than 480 PG/ML

Patients who present with dyspnea and BNP level equal to or greater than 480 have a

nearly 30-fold increased risk for a cardiac event in the next 6 months.

Bedside Glucose	2/25/15	0848	101	H	(65-99)	mg/dL
Bedside Glucose	2/25/15	0741	200	H	(65-99)	mg/dL
ABG pH	2/25/15	0750	7.29	L	(7.35-7.45)	
ABG PCO2	2/25/15	0750	42.8		(32-45)	mmHg
ABG pO2	2/25/15	0750	328.0	H	(83-100)	mmHg
Art pO2 Corr	2/25/15	0750	328	H	(83-100)	mmHG
ABG HCO3	2/25/15	0750	20	L	(22-26)	mmol/L
ABG Base Excess	2/25/15	0750	-5.7	L	(-2 to +2)	
ABG O2 Sat	2/25/15	0750	100.0	H	(95-99)	%

**ORDERS**

Ordered	Procedure Name	Ordering Provider	E-Signed
02/25/15 0733	CBC w/ Differential	Lauterbach, Stewart A, ACT	No
02/25/15 0733	CMP Comp Metabolic Panel CMP	Lauterbach, Stewart A, ACT	No
02/25/15 0733	Cardiac Panel Baseline	Lauterbach, Stewart A, ACT	No
02/25/15 0733	PT Prothrombin Time w INR PT	Lauterbach, Stewart A, ACT	No
02/25/15 0733	PTT Act Partial Thromboplastin	Lauterbach, Stewart A, ACT	No
02/25/15 0733	Lactic Acid Level LA	Lauterbach, Stewart A, ACT	No

GUTIERREZ, CYNTHIA

Age/Sex 33/F

Status ADM IN

Acct# SV0083448563

Unit# SM02706496



000269

SRMH(2) 20176

DATE: 02/25/15 @ 0927  
USER: EDM MNRNorthern California EDM \*LIVE\*  
ED Summary Report

PAGE 7

**Santa Rosa Memorial**

Patient: GUTIERREZ, CYNTHIA	02/25/15 0754 Room S25	Acct# SV0083448563
Age/Sex 33/F DOB 07/31/1981	Height 5 ft 2 in	Unit# SM02706496
Status ADM IN (NSMW268-01)	Weight 58.2 kg	Dep'd 02/25/15 0837
ED.Phys Lauterbach, Stewart A	PC.Phys Southwest Community, Health Cli	
02/25/15 0733 XR Chest 1V Portable	Lauterbach, Stewart A, ACT	No
02/25/15 0733 EKG/ ECG	Lauterbach, Stewart A, ACT	No
02/25/15 0733 ZTAG-E-ED-Code-Critical	Lauterbach, Stewart A, ACT	N/A
02/25/15 0733 Urinalysis (UA)	Lauterbach, Stewart A, ACT	No
02/25/15 0733 Morphology	Lauterbach, Stewart A, ACT	No
02/25/15 0746 CMP Comp Metabolic Panel CMP	Lauterbach, Stewart A, ACT	Yes
02/25/15 0746 CBC w/ Differential	Lauterbach, Stewart A, ACT	Yes
02/25/15 0746 Lactic Acid Level LA	Lauterbach, Stewart A, ACT	Yes
02/25/15 0746 PT Prothrombin Time w INR PT	Lauterbach, Stewart A, ACT	Yes
02/25/15 0747 Arterial Blood Gas ABG	Lauterbach, Stewart A, ACT	No
02/25/15 0751 CT Head Brain wo IV	Lauterbach, Stewart A, ACT	Yes
02/25/15 0808 Glucose Bedside	Lauterbach, Stewart A, ACT	N/A
02/25/15 0811 Admit as Inpatient	Kang, Hyun	Yes
02/25/15 0811 Code/ Resuscitation Status	Kang, Hyun	Yes
02/25/15 0811 * Bedrest	Kang, Hyun	Yes
02/25/15 0811 RC Vent Adult/PED	Kang, Hyun	Yes
02/25/15 0811 * Elevate Head Of Bed HOB	Kang, Hyun	Yes
02/25/15 0811 CBC w/ Differential	Kang, Hyun	Yes
02/25/15 0811 CBC w/ Differential	Kang, Hyun	Yes
02/25/15 0811 CBC w/ Differential	Kang, Hyun	Yes
02/25/15 0811 CBC w/ Differential	Kang, Hyun	Yes
02/25/15 0811 CBC w/ Differential	Kang, Hyun	Yes
02/25/15 0811 BMP Basic Metabolic Panel BMP	Kang, Hyun	Yes
02/25/15 0811 BMP Basic Metabolic Panel BMP	Kang, Hyun	Yes
02/25/15 0811 BMP Basic Metabolic Panel BMP	Kang, Hyun	Yes
02/25/15 0811 BMP Basic Metabolic Panel BMP	Kang, Hyun	Yes
02/25/15 0811 BMP Basic Metabolic Panel BMP	Kang, Hyun	Yes
02/25/15 0811 BMP Basic Metabolic Panel BMP	Kang, Hyun	Yes
02/25/15 0811 ZTAG-N-ICU-Admission	Kang, Hyun	Yes
02/25/15 0811 * NPO Now	Kang, Hyun	Yes
02/25/15 0811 * Daily Weight kg	Kang, Hyun	Yes
02/25/15 0811 XR Chest 1V Portable	Kang, Hyun	Yes
02/25/15 0811 VTE Risk Assessment	Kang, Hyun	Yes
02/25/15 0811 ZTAG-E-VTE-Prophylaxis	Kang, Hyun	Yes
02/25/15 0811 Propofol 10 mg/mL Inj (Dipr...)	Kang, Hyun	Yes
02/25/15 0811 Sodium Chloride 0.9... w/Pa...	Kang, Hyun	Yes
02/25/15 0811 NPO Diet	Kang, Hyun	Yes
02/25/15 0813 ED Request to Admit	Lauterbach, Stewart A, ACT	Yes
02/25/15 0850 Glucose Bedside	Lauterbach, Stewart A, ACT	N/A
02/25/15 0855 MRSA Culture Admission	Kang, Hyun	No

**DEPARTURE****Primary Impression:**

Cardiopulmonary arrest

**Secondary Impressions:**

ESRD (end stage renal disease) on dialysis

Disposition: Admit Acute Hosp This Fac

Departure Date/Time: 02/25/15 - 0837

**Comment:**

GUTIERREZ, CYNTHIA

Acct# SV0083448563

Unit# SM02706496

/Sex 33/F

DOB 07/31/1981



000270

SRMH(2) 20177

DATE: 02/25/15 @ 0927  
USER: EDM MNR

Northern California EDM \*LIVE\*  
ED Summary Report

PAGE 8

## Santa Rosa Memorial

Patient: GUTIERREZ, CYNTHIA  
Age/Sex 33/F DOB 07/31/1981  
Status ADM IN (NSMW268-01)  
ED.Phys Lauterbach, Stewart A

02/25/15 0754 Room S25  
Height 5 ft 2 in  
Weight 58.2 kg  
PC.Phys Southwest Community, Health Cli

Condition: Critical

## Referrals:

Southwest Community, Health Cli  
751 Lombardi Ct  
Santa Rosa, CA 95407  
Phone: 707-547-2222 Fax: 707-547-2229

## Pt Instructions:

## Additional Instructions:

## Care Plan:

## Departure Forms:

## Departure Screen :

## CARE PROVIDERS

## Staff History:

ED Physician:  
02/25/15 0741 Lauterbach, Stewart A, ACT  
Practitioner:  
Nurse:  
02/25/15 0910 Bishop, Deborah, RN

GUTIERREZ, CYNTHIA

/Sex 33/F DOB 07/31/1981  
Status ADM IN

Acct# SV0083448563

Unit# SM02706496



000271

SRMH(2) 20178

Santa Rosa Memorial  
1165 Montgomery Drive  
Santa Rosa, CA 95405

## Imaging Services

Patient Name: GUTIERREZ,CYNTHIA  
Account #: SV0083448385  
Unit #: SM02706496

DOB: 07/31/1981  
Age/Sex: 33/F  
Location: NSMED

Admitting Dr:  
Ordering Dr: Brandwene, Elliott L MD  
Primary Dr: Southwest Community, Health Cli  
Exam Performed: XR Chest 1V Portable  
Date of Service: 02/25/15  
Req #: 15-0046705  
Accession #: 785411.001NSM

EXAMINATION: PORTABLE CHEST X-RAY: 02/25/2015

CLINICAL HISTORY: Congestion; cough.

COMPARISON: February 12.

FINDINGS: Portable view of the chest obtained. Stable right IJ large bore dual lumen central line. Heart is enlarged but stable. No pneumothorax. There is prominence of the pulmonary vascularity as well as bilateral interstitial infiltrates. No significant effusion on portable exam.

IMPRESSION:  
Stable cardiomegaly. There is pulmonary vascular congestion and interstitial infiltrates. Findings suggest fluid overload with congestive failure.

Findings noted by ER physician.

Job #:  
76171602  
<Electronically signed by Shawn P Daly MD> 02/25/15 1440  
Signed

Shawn P Daly MD

Report #: 0225-0120  
Dictated Date/Time: 02/25/15 0822  
Transcribed Date/Time: 02/25/15 0927  
Transcriptionist: WEISSDI01

Imaging Services Report  
Report Status: Signed  
Unit #: SM02706496  
Report #: 0225-0120  
Page 1 of 2

Patient Name: GUTIERREZ,CYNTHIA  
Account #: SV0083448385  
Dictated By: Shawn P Daly MD

000272

SRMH(2) 27642

## EXHIBIT D

Atkinson-Baker Court Reporters  
www.depo.com

1                   UNITED STATES DISTRICT COURT  
2                   NORTHERN DISTRICT OF CALIFORNIA  
3                   - - -  
4     CYNTHIA GUTIERREZ, JOSE HUERTA,       )  
5     SMH, RH and AH,                          )  
6                         Plaintiffs,            )  
7                         )    No. 4:16-cv-02645-DMR  
8     SANTA ROSA MEMORIAL HOSPITAL,        )  
9     ST. JOSEPH HEALTH and DOES 1-50,      )  
10    inclusive,                                )  
11                         Defendants.           )  
12  -----  
13  
14  
15                   DEPOSITION OF  
16                   STEWART LAUTERBACH, M.D.  
17                   SANTA ROSA, CALIFORNIA  
18                   MARCH 22, 2017  
19  
20  
21                   ATKINSON-BAKER, INC.  
22                   COURT REPORTERS  
23                   (800) 288-3376  
24                   REPORTED BY:       MICHELLE D. BARBANTE, CSR NO. 12601  
25                   FILE NO.:       AB02108

Atkinson-Baker Court Reporters  
www.depo.com

1 A. No.  
 2 Q. **Do you know where she's at?**  
 3 A. I don't.  
 4 Q. **Okay. Do you know when she left?**  
 5 A. About a year ago.  
 6 Q. **And your preparation of this record, is it**  
 7 **similar to your preparation of the August 10, 2014, record**  
 8 **in that the scribe would have inputted anything that did**  
 9 **not automatically populate up to the medical decision**  
 10 **making section?**  
 11 A. That's correct.  
 12 Q. **All right. Okay. How did you come to see or**  
 13 **treat Ms. Gutierrez on February 25, 2015?**  
 14 A. It was the beginning of the shift. I had come  
 15 to work, and Dr. Brandwene had worked over the night, and  
 16 as is our custom, he went over the patients in the  
 17 department. This patient had been discharged and was not  
 18 brought to my attention because she was no longer in the  
 19 department.  
 20 Q. **Can I stop you right there? What time does that**  
 21 **occur? What was the shift change time?**  
 22 A. At that point, I'm pretty sure we were doing  
 23 7:00 a.m.  
 24 Q. **And would you actually do the shift at 7:00 a.m.**  
 25 **or did you have to be there at 6:45 to start the shift**

Page 18

1 anything I need to know?" And then usually we'll dive  
 2 into patients and start seeing new patients, because the  
 3 existing doc will hang around for a while to try to wrap  
 4 up their loose ends. When they're ready to go, they'll  
 5 corner us and go over the patients in the department.  
 6 Q. **And customarily when does that occur?**  
 7 A. Anywhere from 15 minutes to two hours after --  
 8 Q. **Okay.**  
 9 A. -- shift ends.  
 10 Q. **Okay. On this particular day, February 25,**  
 11 **2015, do you have a recollection of getting the shift**  
 12 **report prior to seeing Ms. Gutierrez?**  
 13 A. I -- I don't have recollection of it being  
 14 before I saw her, but I'm sure I had -- it had been done,  
 15 because he had left.  
 16 Q. **Okay.**  
 17 A. And it wouldn't happen -- he wouldn't leave  
 18 without it.  
 19 Q. **Right. Okay. So you have a recollection of**  
 20 **Dr. Brandwene being gone by the time you saw**  
 21 **Ms. Gutierrez?**  
 22 A. Correct.  
 23 Q. **All right. And because she was not a patient**  
 24 **there anymore, you're confident you did not receive any**  
 25 **type of report about her in that exchange?**

Page 20

1 **change? How did that work?**  
 2 A. Technically, we start at 7:00.  
 3 Q. **Okay.**  
 4 A. That depends on the habit of the person coming  
 5 in.  
 6 Q. **What was your custom and practice for coming in?**  
 7 A. I'm always there a couple of minutes early.  
 8 Q. **Okay. And is the first thing you do -- strike**  
 9 **that.**  
 10 **Do you clock in, sign in, anything like that?**  
 11 A. Just log in to the computer.  
 12 Q. **Okay. And then after you log in, is that --**  
 13 **strike that.**  
 14 **Is that the first thing you do is log in to the**  
 15 **computer?**  
 16 A. Mm-hm.  
 17 Q. **Is that yes?**  
 18 A. Yes.  
 19 Q. **Okay. And then is the next thing you do, go**  
 20 **find the doctor who's working the shift before and get a**  
 21 **report?**  
 22 A. Not necessarily.  
 23 Q. **Okay.**  
 24 A. There's usually a pretty quick exchange between  
 25 the two docs, and something to the extent of, "Is there

Page 19

1 A. I -- I did not.  
 2 Q. **Okay. All right. Okay. So you -- you came in,**  
 3 **you clocked in. At some point prior to seeing**  
 4 **Ms. Gutierrez, you received a report from Dr. Brandwene**  
 5 **and he had left. How did you get involved in**  
 6 **Ms. Gutierrez's care?**  
 7 A. I don't remember the exact details, but I know  
 8 that the patient had collapsed in the lobby or was found  
 9 unresponsive. Our crew was sent out to bring her back --  
 10 and that would usually consist of the triage nurse and one  
 11 or two techs and maybe another nurse or two -- and brought  
 12 her immediately to one of our critical care rooms.  
 13 Q. **Did you see the patient while she was still in**  
 14 **the waiting room, or did you see her when she was brought**  
 15 **into the critical care room?**  
 16 A. My recollection is that I saw her as she was  
 17 wheeled down the hall to the critical care room and  
 18 traveled down there with her.  
 19 Q. **And was this a -- some sort of code that was**  
 20 **called at the hospital?**  
 21 A. We don't call codes overhead for the emergency  
 22 department. After all, we are the code center. We have  
 23 all our resources. We don't look for outside resources.  
 24 With a few exceptions, and this would not have been one of  
 25 those exceptions.

Page 21

6 (Pages 18 to 21)

Stewart Lauterbach, M.D.  
March 22, 2017

Atkinson-Baker Court Reporters  
www.depo.com

1 A. Well, initially, we'll try it with a bag-valve  
2 mask. The techs or the respiratory therapist will grab a  
3 bag-valve mask and start bagging somebody. And then we  
4 will immediately turn to intubating a patient to get a  
5 secure airway.

6 And you must understand that at this point we  
7 have a team of about six people there, and everybody has  
8 assignments and they position themselves in the  
9 appropriate places. So our -- our responsibility in the  
10 beginning, as the head of the bed, to control the airway.  
11 At the same time, we'll have nurses putting monitor leads  
12 on. We'll have other nursing getting IVs in. We'll  
13 have -- or techs getting IVs in. Respiratory therapist or  
14 a tech will be bagging the patient. So there's a lot  
15 simultaneously going on.

16 Q. And that kind of goes back to my earlier  
17 question where I asked what was your role, and that's what  
18 I was trying to figure out. I understand -- so there is a  
19 team of individuals, six people possibly there, doing  
20 things. What is it that you personally are doing?

21 MR. NELSON: He said he's at the head of the  
22 bed.

23 BY MR. SCHOEL:

24 Q. Head of the bed. All right. Fine.

25 A. But I'm the captain of the ship, so I'm

Page 26

1 dictating or ordering, you know: Let's -- let's get this  
2 med on board, let's do this. And I think in this  
3 dictation in the back, I talked about giving calcium and  
4 bicarb right away.

5 Q. Okay.

6 A. I'd have to go back and review that, but I  
7 believe we did, because the most common cause of cardiac  
8 arrest -- sorry, one of the most common causes of cardiac  
9 arrest in a dialysis patient is a hyperkalemia, and so the  
10 first thing you do --

11 Q. Hyper or hypo?

12 A. Kalemia.

13 Q. But hyper or hypo?

14 A. Hyperkalemia. And so the initial thing that we  
15 would do is start treating the hyperkalemia, even if you  
16 don't know what the potassium is.

17 Q. Okay.

18 MR. NELSON: So are you interested in what he  
19 did with this patient?

20 MR. SCHOEL: Yes.

21 MR. NELSON: So with this patient, he's asking  
22 what you recall and/or what's reflected that you did.

23 BY MR. SCHOEL:

24 Q. And what I'm getting at, I understand you're the  
25 captain of the ship, and that's what I'm getting to the

1 specifics. I assume you're not just standing at the head  
2 of the bed. You're either -- like you told me already,  
3 you're making -- you're giving orders. Are you physically  
4 doing anything? Are you helping to establish airway?

5 A. Oh, yeah.

6 Q. That's what I'm asking.

7 A. I intubated this patient.

8 Q. Okay. And that's where I'm kind of going. But  
9 prior to intubating the patient, were you doing anything  
10 else? I mean, you're there at the head of the bed.

11 A. Well, I mean, the initial thing is gathering  
12 information: What happened?

13 Q. Okay. All right.

14 A. What do we know about this patient? What's  
15 their past medical history? What kind of drugs are they  
16 on?

17 Q. Okay.

18 A. It's --

19 Q. So you gather information?

20 A. As much as we can in as brief a time as  
21 possible.

22 Q. Okay.

23 A. And then get an airway established.

24 Q. Okay.

25 A. And then once the airway's established, turn

Page 28

1 attention to blood pressure, blood flow, heart rate,  
2 monitor rhythm, and --

3 Q. And how did you establish the airway in this  
4 patient? I know I'm asking some basic questions, but I  
5 want you to take me step by step.

6 A. Okay.

7 Q. What you did and what you would normally do  
8 based on your custom and practice. So how did you  
9 establish an airway in this case?

10 A. In this case -- in any case like this where a  
11 patient's unresponsive, we would intubate the patient.

12 Q. Okay.

13 A. So the first thing that I would do is focus on  
14 preparing for intubation, and that is gathering the  
15 appropriate equipment. Usually we have a respiratory  
16 therapist there with us. And in this case, Dan Bradford  
17 was the respiratory therapist. In my medical decision  
18 making, I note his name. And --

19 Q. And is the --

20 A. In the addendum I did.

21 MR. NELSON: So you gathered the equipment.

22 THE WITNESS: Yeah.

23 MR. NELSON: What next did you do here?

24 THE WITNESS: And then take the laryngoscope,

25 look inside, look in the patient's mouth, look for the

Page 27

Page 29

8 (Pages 26 to 29)

Stewart Lauterbach, M.D.  
March 22, 2017

Atkinson-Baker Court Reporters  
www.depo.com

<p>1 anatomic structures we need to identify, take the tube and 2 put it in the trachea.</p> <p>3 BY MR. SCHOEL:</p> <p>4 Q. And is that you physically doing it or is the 5 respiratory therapist doing it?</p> <p>6 A. No, I'm doing it.</p> <p>7 Q. Okay. And I know we can just kind of skip to 8 it, I know it's in your addendum, but I note in your 9 addendum, if I understood it correctly, that there was a 10 large piece of food was aspirated from the ET tube; is 11 that correct?</p> <p>12 A. So after the tube was in, and then Dan would 13 have taken and secured the tube and suctioned it. And 14 when he suctioned it, he pulled out a piece of food, and 15 it was fairly large. And that would have been within a 16 couple of minutes of the time we intubated the patient.</p> <p>17 Q. When you inspected the airway before placing the 18 tube, could you see the food?</p> <p>19 A. I did not see it.</p> <p>20 Q. When you arrived to the patient's bed, as she's 21 being wheeled down the hallway, you said they were already 22 bagging the patient?</p> <p>23 MR. NELSON: Bag-valve would be used.</p> <p>24 THE WITNESS: Bag-valve mask. It's my 25 recollection, yes.</p>	<p>1 whether that's what -- that was the cause of her collapse?</p> <p>2 A. No.</p> <p>3 Q. Okay. Is that unusual to have food suctioned 4 out of the endotracheal tube?</p> <p>5 A. It's -- it's relatively unusual, but it does 6 happen. That's the way Henry Heimlich developed the 7 Heimlich maneuver.</p> <p>8 Q. Explain to me, how far down does the 9 endotracheal tube go?</p> <p>10 A. Ideally, about three centimeters above the 11 carina.</p> <p>12 Q. So this is not food being suctioned out of the 13 stomach?</p> <p>14 A. No. No, no. It's coming out of the respiratory 15 tree somewhere.</p> <p>16 Q. And again, can you help me understand. Explain 17 the anatomy to me again. So it goes down about 18 three centimeters where?</p> <p>19 A. Above the carina.</p> <p>20 Q. And where is that?</p> <p>21 A. The carina is where the main stem bronchus 22 splits into the right and left bronchi -- or the trachea 23 and splits into the right and left main stem bronchus.</p> <p>24 Q. So it's still in the trachea?</p> <p>25 A. Yes.</p>
Page 30	Page 32
<p>1 BY MR. SCHOEL:</p> <p>2 Q. From your perception, was it being used 3 effectively?</p> <p>4 A. I can't answer that.</p> <p>5 Q. You don't know one way or the other?</p> <p>6 A. I don't know one way or the other.</p> <p>7 Q. The large piece of food that was removed, could 8 you identify what it was?</p> <p>9 A. I probably could have if I cared about taking 10 the time to do it. That's -- it doesn't matter to me what 11 it is. What matters is that we get the airway open.</p> <p>12 Q. Is the food just discarded at that point?</p> <p>13 A. Yeah.</p> <p>14 MR. FLADSETH: Is that a "yes"?</p> <p>15 THE WITNESS: Yes.</p> <p>16 MR. FLADSETH: Thank you.</p> <p>17 BY MR. SCHOEL:</p> <p>18 Q. You also wrote here in your addendum that you 19 questioned that the -- whether she could have had an 20 aspiration leading to hypoxia and the collapse. Does that 21 mean the food was block -- she was choking?</p> <p>22 A. That would be my speculation based on my 23 statement there.</p> <p>24 Q. Okay. Were you able to confirm one way or the 25 other back on February 25, 2015, or shortly thereafter,</p>	<p>1 Q. So presumably the food was in the trachea?</p> <p>2 A. Presumably the food was in the trachea 3 somewhere.</p> <p>4 Q. Okay. Now the "Medical Decision Making" portion 5 of this chart you typed in yourself or dictated in using 6 Dragon, correct?</p> <p>7 A. Using Dragon, correct.</p> <p>8 Q. The addendum, is that something you also 9 dictated yourself?</p> <p>10 A. Yes.</p> <p>11 Q. All right. Now it looks like you signed your 12 note after finishing, based on your custom and practice, 13 the "Medical Decision Making" section on February 25?</p> <p>14 A. Twenty-six.</p> <p>15 Q. Oh, I'm sorry. You're right. I'm sorry. You 16 signed your note on February 26th, 2015, at 9:38; is that 17 correct?</p> <p>18 A. That's correct.</p> <p>19 Q. And that's when you would have written, based on 20 your custom and practice, the "Medical Decision Making" 21 section?</p> <p>22 A. That's right.</p> <p>23 MR. FLADSETH: Where did you get that time?</p> <p>24 THE WITNESS: It's the very last line on the 25 whole thing.</p>
Page 31	Page 33

9 (Pages 30 to 33)

STEWART LAUTERBACH, M.D., VOLUME II - 12/18/2017

<p style="text-align: right;">Page 75</p> <p>1 A. No.</p> <p>2 Q. All right. Did you review any documents to 3 prepare for today's deposition?</p> <p>4 A. Just the emergency department record.</p> <p>5 MR. FLADSETH: Okay. Let's mark that as 6 Exhibit 2 please.</p> <p>7 (Whereupon Plaintiffs' Exhibit 1 was 8 marked for identification.)</p> <p>9 BY MR. FLADSETH:</p> <p>10 Q. Now, when we did your first deposition, we 11 marked two exhibits, A and B -- actually, Mr. Schoel on 12 behalf of the hospital took the lead in that deposition, 13 so that's why they're A and B rather than 1 and 2, which 14 plaintiff would use numbers.</p> <p>15 Is that the same as one of the exhibits to --</p> <p>16 A. I don't know --</p> <p>17 Q. Can I just see it?</p> <p>18 A. I don't know what A and B are, so I can't --</p> <p>19 Q. Oh, okay. Can I see your Exhibit 2 today.</p> <p>20 Thanks.</p> <p>21 MR. FINKEL: It look looks like Exhibit B, 22 although there may be a page or two extra in what the 23 doctor looked at.</p> <p>24 MR. FLADSETH: Okay.</p> <p>25 MR. FINKEL: You can see...</p>	<p style="text-align: right;">Page 76</p> <p>1 BY MR. FLADSETH:</p> <p>2 Q. All right. So Exhibit 2 to today's deposition 3 includes your addendum note of February 26th, 2015, 4 correct?</p> <p>5 A. Yes.</p> <p>6 Q. Now, is everything below that one paragraph 7 that is electronically signed by you at 13 -- or 11:13 8 hours on the 26th, is everything below that, like the 9 bottom half of the page, does that start with what the 10 original note was?</p> <p>11 A. It started with the original note.</p> <p>12 Q. Okay. So then the top half of the first page 13 of Exhibit 2 is your addendum, and the rest of it is the 14 original note from the 25th?</p> <p>15 A. Well, I completed the original note on the 16 26th.</p> <p>17 Q. Okay.</p> <p>18 A. I signed it off at 9:38 in the morning.</p> <p>19 Q. Okay. But what you added as an addendum is 20 just the top half of the first page --</p> <p>21 A. Correct.</p> <p>22 Q. -- of Exhibit 2?</p> <p>23 A. Correct.</p> <p>24 Q. And the rest of it was there before?</p> <p>25 A. Correct.</p>
<p style="text-align: right;">Page 77</p> <p>1 Q. And meaning that it was there on the 25th?</p> <p>2 MR. SCHOEL: Objection. Misstates the 3 document.</p> <p>4 MR. FINKEL: Join.</p> <p>5 MR. FLADSETH: Okay. That's why I'm trying to 6 make sure we're on the same page here.</p> <p>7 MR. FINKEL: He just explained he signed the 8 original note the morning of the 26th.</p> <p>9 MR. FLADSETH: Right.</p> <p>10 MR. FINKEL: A few hours before signing the 11 addendum.</p> <p>12 BY MR. FLADSETH:</p> <p>13 Q. Okay. But signing is one thing. When did you 14 type it in in the first place?</p> <p>15 A. The medical decision making I would have done 16 it immediately before I signed it on the 26th. I 17 usually do those the next day.</p> <p>18 Q. Okay. So everything -- your whole note, 19 nothing was typed in by you on the 25th; is that 20 correct?</p> <p>21 A. I can't answer that for sure. I certainly 22 could have entered some of this stuff or my scribe would 23 have entered it. But what I attempt to do and my custom 24 is to sit down the next day and to do a medical 25 decision-making course that explains to the other</p>	<p style="text-align: right;">Page 78</p> <p>1 doctors and the people who are going to take care of the 2 patient what really happened..</p> <p>3 Q. Okay.</p> <p>4 A. Because the electronic record just is 5 impossible to read.</p> <p>6 Q. Okay. So if we start with February 25th, 7 2015, you were called because of the equivalent of a 8 code blue, right? They don't call it a code blue 9 because you're already in the ER, but you were called 10 emergently to respond?</p> <p>11 A. I was the physician on duty when the code 12 happened.</p> <p>13 Q. Okay. And then what --</p> <p>14 A. I was the only one there so it's...</p> <p>15 Q. Yeah. Well, I mean, how did you know to first 16 respond to Cynthia Gutierrez was down?</p> <p>17 A. Somebody collapsed in the lobby and our crew 18 got sent out. And it's a small enough department. We 19 pretty much know -- when you're the only one working, 20 you pretty much know what's going on everywhere.</p> <p>21 Q. Sure.</p> <p>22 Do you actually remember like hearing somebody 23 shout or saying, "Dr. Lauterbach, please come to the 24 waiting room?" Or do you have any memory of that?</p> <p>25 A. I don't have any memory of that.</p>

STEWART LAUTERBACH, M.D., VOLUME II - 12/18/2017

<p style="text-align: right;">Page 79</p> <p>1 Q. Okay. Now, when you -- did you actually get 2 to the waiting room?</p> <p>3 A. No.</p> <p>4 Q. Where was Cynthia when you first saw her?</p> <p>5 A. Being wheeled down the hall by the staff.</p> <p>6 Q. Okay. And which hall was she in?</p> <p>7 A. I don't know how to answer that question.</p> <p>8 Q. Okay. Somewhere between --</p> <p>9 A. The waiting room and the critical care bed.</p> <p>10 Q. And where is the critical care bed located?</p> <p>11 A. 23 and 24.</p> <p>12 Q. I mean, it's in the ER?</p> <p>13 A. Oh, yes.</p> <p>14 Q. Okay. And was that in the old building or the 15 new ER building?</p> <p>16 A. It's all in our new department.</p> <p>17 Q. So how far was it from the waiting room to the 18 critical care bed where Cynthia went?</p> <p>19 A. Oh, I've never paced it out. So I have to 20 speculate.</p> <p>21 Q. Well, just give me your best estimate. I 22 mean, you've been there plenty of times, I'm sure.</p> <p>23 A. Less than a minute wheeling the patient.</p> <p>24 Q. How about in distance? Is it like 50 yards, 25 100 yards, or what?</p>	<p style="text-align: right;">Page 80</p> <p>1 A. Probably 30 yards.</p> <p>2 Q. Okay. And so do you remember when you first 3 saw Cynthia whether she was closer to the waiting room 4 or closer to the -- what do you call it? The ICU room?</p> <p>5 A. The critical care bed.</p> <p>6 Q. Critical care bed, yeah.</p> <p>7 A. Probably two-thirds of the way. I met her in 8 the hall.</p> <p>9 Q. And she's on a gurney?</p> <p>10 A. Uh-huh.</p> <p>11 Q. Yes?</p> <p>12 A. Yes.</p> <p>13 Q. And being wheeled by -- who's wheeling her 14 down the hallway?</p> <p>15 A. I have no recollection of who was doing it.</p> <p>16 Q. Okay. Is it nurses, techs, doctors? Do you 17 have that recollection?</p> <p>18 A. Well, it wouldn't have been doctors because I 19 was the only one. So it would have been nurses and 20 techs.</p> <p>21 Q. And do you recall, like was it one person, 22 five people? You have any recollection of that?</p> <p>23 A. It would have been more than one because they 24 had to get her in the bed and one person couldn't do 25 that. But I don't have a recollection.</p>
<p style="text-align: right;">Page 81</p> <p>1 Q. Okay. So if she's on the floor in the waiting 2 room, what would be the usual procedure if they're going 3 to transport her to the critical care room? I mean, 4 would it be on a gurney?</p> <p>5 A. On a gurney.</p> <p>6 Q. So someone would have taken the gurney from 7 the ER down to the waiting room?</p> <p>8 A. Yes.</p> <p>9 Q. And then they lift her onto the gurney and 10 then wheel her down to the critical care room?</p> <p>11 A. Uh-huh.</p> <p>12 Q. Yes?</p> <p>13 A. Correct.</p> <p>14 Q. And then when you get to the critical care 15 room, would she be moved onto a bed or a table or 16 something?</p> <p>17 A. No. The gurney that was in there would have 18 been pulled out, and the one that she was placed on 19 originally would have gone back -- would have just gone 20 straight into that slot.</p> <p>21 Q. Okay. Let me see if I understand.</p> <p>22 So she's wheeled down the hall. You follow 23 her the last third of the way to the critical care bed 24 in the ER. And then had someone already started CPR?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 82</p> <p>1 Q. So as she's being wheeled, someone's doing 2 what?</p> <p>3 A. Somebody has a bag and they're bagging her and 4 somebody's usually on the gurney doing CPR.</p> <p>5 Q. Okay. And did you see that happening?</p> <p>6 A. Oh, yes.</p> <p>7 Q. All right. And then when she got to the room, 8 did CPR continue on the gurney or was she moved to 9 another thing?</p> <p>10 A. The gurneys in the emergency department are 11 essentially all identical. One went up to the lobby to 12 get her. They bring her in, and they put it in the slot 13 she's going into.</p> <p>14 Q. I see. Okay.</p> <p>15 A. If there was a gurney in that slot waiting, it 16 would have been thrown out in the hall and she would 17 have been moved in. So she was not transferred at 18 another time.</p> <p>19 Q. Okay. And at some point, the scribe, 20 Kristina Arnold --</p> <p>21 A. Uh-huh.</p> <p>22 Q. -- joined you?</p> <p>23 A. Correct.</p> <p>24 Q. When did she join you?</p> <p>25 A. Describes her pretty much with us the entire</p>

STEWART LAUTERBACH, M.D., VOLUME II - 12/18/2017

<p style="text-align: right;">Page 91</p> <p>1 here because anybody I can have come in off the street      2 and they could speculate. But since you were there and      3 you're familiar with this process, I want to make sure      4 I'm getting your best estimate?</p> <p>5 MR. FINKEL: Is that your best estimate as to      6 opposed to speculation?</p> <p>7 THE WITNESS: Yes. Yeah. This is the best --      8 this is the best estimate we can do.</p> <p>9 BY MR. FLADSETH:</p> <p>10 Q. Sure. That's all I want to get. Thank you.      11 Okay. So 7:26 a.m. CPR began?</p> <p>12 A. Correct.</p> <p>13 Q. And I saw somewhere in the records that there      14 was a reference to 7:20. Do you know what happened at      15 7:20?</p> <p>16 A. I have no idea.</p> <p>17 Q. Do you know what time Mrs. Gutierrez -- I'm      18 not sure what the right term is -- crashed or collapsed      19 to the floor or whatever happened in the waiting room?</p> <p>20 A. I do not know.</p> <p>21 Q. And do you know how long she'd been sitting in      22 the waiting room before she crashed or collapsed?</p> <p>23 A. I do not know.</p> <p>24 Q. So as soon as she got into the critical care      25 room, the -- all the staff, they're doing all these</p>	<p style="text-align: right;">Page 92</p> <p>1 things simultaneously, you're managing the airway,      2 correct?</p> <p>3 A. Correct.</p> <p>4 Q. And so one of the monitors that she's being      5 hooked up to immediately is the heart monitor?</p> <p>6 A. Correct.</p> <p>7 Q. And do you recall what that showed?</p> <p>8 A. My note reflects that it showed a cardiac      9 rhythm.</p> <p>10 Q. What kind of monitor is that? I thought I      11 heard you say "ultrasound" something at some point.</p> <p>12 A. It's a monitor on the wall that has the wiggly      13 lines.</p> <p>14 Q. Like the little TV screen or computer screen?</p> <p>15 A. Yes. Computer screen.</p> <p>16 Q. Okay. And so is that -- what, is there like a      17 prong that's put on the finger or something?</p> <p>18 A. They're -- there are -- in this case, the      19 patient would be on two monitors. They would be put on      20 two. One is the defibrillator. If they're in cardiac      21 arrest, they're hooked to a defibrillator immediately.      22 That's two stickers that go (indicating) on the chest.</p> <p>23 Q. So that's --</p> <p>24 A. Anterior and posterior on the chest.</p> <p>25 Q. Thank you.</p>
<p style="text-align: right;">Page 93</p> <p>1 A. The other monitor, and that would be -- that      2 monitor would be on a bedside table. The other monitor      3 has four stickers that are placed on the chest that      4 reflect two different views of the EKG. An oxygen      5 saturation monitor is hooked to that same monitor. That      6 would tell us pulse rate and oxygen saturation. If      7 functioning -- and it doesn't always function when      8 there's not good blood flow.</p> <p>9 The blood pressure cuff would be put on, and      10 that also would be displayed on the monitor.</p> <p>11 And through compliance, the respiratory rate      12 would be displayed on that monitor. It's electronically      13 calculated from the four leads.</p> <p>14 Q. So where are these vital signs first      15 documented?</p> <p>16 A. The first set of vital signs are at 7:28.</p> <p>17 Heart rate of 38.</p> <p>18 Q. And it looks like it says "intubated"?</p> <p>19 A. That's the first thing that we do is establish      20 an airway. So that first thing I do is, at the head of      21 the bed, get that tube in. And that would have been the      22 time that I did it.</p> <p>23 Q. All right. So the first thing when she got      24 into the critical care room is you would have intubated      25 her?</p>	<p style="text-align: right;">Page 94</p> <p>1 A. Correct.</p> <p>2 Q. And did you use a laryngoscope for that?</p> <p>3 A. Correct.</p> <p>4 Q. And so when you use the laryngoscope, what can      5 you visualize?</p> <p>6 A. I don't recall whether I used an electronic      7 one or a manual one. I'm in the habit of using the      8 manual because I have 30 years experience with that, and      9 the electronic ones are the newfangled things.</p> <p>10 But with either you can visualize usually the      11 epiglottis and the arytenoids. Sometimes you can see      12 the vocal cords.</p> <p>13 Q. The epiglottic and -- what was the second one?</p> <p>14 A. Arytenoids.</p> <p>15 Q. How do you spell that?</p> <p>16 A. I don't know.</p> <p>17 Q. Say it one more --</p> <p>18 A. Spelling was not a prerequisite for medical      19 school.</p> <p>20 Q. Yeah, I know. Okay. Just say it one more      21 time.</p> <p>22 A. Arytenoids.</p> <p>23 Q. And what is an arytenoid?</p> <p>24 A. The -- the epiglottis structure has the      25 epiglottis, which is the valve that opens and closes and</p>

STEWART LAUTERBACH, M.D., VOLUME II - 12/18/2017

Page 95

1 which forms a circle. And the arytenoids are the little  
 2 bumps around the outside edge that goes down to the  
 3 posterior aspect of the opening.

4 Q. Okay. So what you're looking for is you want  
 5 to make sure that you stick the bleeding tube into the  
 6 lungs rather than the stomach, right?

7 A. Exactly.

8 Q. In lay terms anyway.

9 A. Stick it in the right hole.

10 Q. Okay. And when you use the laryngoscope, are  
 11 you able to see the trachea?

12 A. Sometimes you can; sometimes you cannot.

13 Q. And --

14 A. And I don't have a recollection of whether I  
 15 could at this point or not.

16 Q. Okay. Is there anything documented about when  
 17 you use the laryngoscope whether you could see the  
 18 trachea or not?

19 A. I don't think I put a -- in my medical  
 20 decision making, I don't think I mentioned that.

21 No, I don't mention that, so I don't have a  
 22 recollection.

23 Q. So the breathing tube is called an  
 24 endotracheal tube?

25 A. Correct.

Page 96

1 Q. Did you have any trouble getting it in  
 2 immediately?

3 A. There's no indication that I had a problem.

4 Q. And there's ways that you verify that the  
 5 endotracheal tube is in the lungs rather than the  
 6 stomach, right?

7 A. Yes. The best way is visualize --  
 8 visualization. You watch it go in.

9 Q. Okay. And did you do any confirmatory tests?

10 A. We always do end-tidal CO<sub>2</sub>. And -- and on the  
 11 critical care sheet, it should have said. It's not on  
 12 that one.

13 So on the -- on page 182, page 6 of 8,  
 14 intubation time, 7:35; reason, arrest; oral tracheal, 8  
 15 tube; crash intubation. And so confirmation equal chest  
 16 rise, visualize going through the cords, condensation in  
 17 the tube, and then post-X-ray confirmation with the  
 18 position readjusted for correct depth.

19 Q. All right. So you put the tube in. You  
 20 actually watched it go into the lugs so you --

21 A. Correct. Into the trachea.

22 Q. So you -- into the trachea. Thank you.

23 So you knew that the tube was going into the  
 24 trachea so it would be oxygenating the lungs?

25 A. Correct.

Page 97

1 Q. And then you did the end-tidal, T-I-D-A-L, CO<sub>2</sub>  
 2 measurement?

3 A. Correct.

4 Q. And did you do that immediately?

5 A. Yes. As soon as the tube is in, the  
 6 respiratory therapist puts a little disc on there on the  
 7 tube that there's a color change. So when there's no  
 8 carbon dioxide, it's one color. When the patient  
 9 expires, there is -- it changes color. It goes from  
 10 blue to yellow.

11 Q. All right. So the -- you and the respiratory  
 12 therapist were able to use the CO<sub>2</sub> end-tidal test to  
 13 make sure that the endotracheal tube was properly placed  
 14 into the trachea and oxygenating the lungs?

15 A. That along with the other modalities we use.

16 Q. Right. But that's -- that was one of the  
 17 things?

18 A. Correct.

19 Q. And then were you and the respiratory  
 20 therapist also able to see the chest rising and falling  
 21 which also confirmed the proper placement of the  
 22 endotracheal tube?

23 A. Correct.

24 MR. FINKEL: Objection. Calls for speculation  
 25 as to what the therapist could see.

Page 98

1 BY MR. FLADSETH:

2 Q. Well, do you know whether the respiratory --

3 A. Well, I could certainly see it.

4 Q. Okay. Was that -- is that something that  
 5 ordinarily the respiratory therapist is looking for,  
 6 too, in the code blue, to your knowledge?

7 A. Yes.

8 Q. And then you mentioned there was some  
 9 condensation in the tube?

10 A. Correct.

11 Q. Does that show whether the tube's been  
 12 properly placed or not?

13 A. It is suggestive of that.

14 Q. And why is that?

15 A. We humidify air within when we breathe. So  
 16 when you inhale, you inhale dry air, and when you  
 17 exhale, you exhale wet air, essentially 100 percent  
 18 humidity. And if it's cold, it's going to -- just like  
 19 breathing on a window, it's going to fog up.

20 Q. And then chest X-ray was done also to confirm  
 21 the placement of the endotracheal tube?

22 A. Correct.

23 Q. And when was that done?

24 A. Usually within -- within a minute or two after  
 25 we get it in.

STEWART LAUTERBACH, M.D., VOLUME II - 12/18/2017

<p style="text-align: right;">Page 99</p> <p>1 Q. So somebody has a portable chest X-ray at the 2 bedside?</p> <p>3 A. There's a machine that the respiratory 4 therapists -- or that X-ray techs respond to all these 5 codes, and they are in the hallway. And -- and when I 6 as the captain of the ship say, "Time for X-ray," they 7 come in and shoot the X-ray. And with the modern 8 technology, there's a monitor on the X-ray machine and 9 we can see it instantly.</p> <p>10 Or I shouldn't say "instantly." Within ten 11 seconds.</p> <p>12 Q. So as soon as you get the endotracheal tube 13 in, they do the chest X-ray within a few seconds?</p> <p>14 A. Within a minute or two.</p> <p>15 Q. Okay.</p> <p>16 A. I should clarify that there's multiple things 17 going on at the same time.</p> <p>18 Q. Right. But one of the things you can see on 19 the -- the chest X-ray is actually what projected on to 20 one of the monitors?</p> <p>21 A. Correct.</p> <p>22 Q. And then you can confirm the proper placement 23 of the ET tube?</p> <p>24 A. Correct.</p> <p>25 Q. And then when was the first oxygen level</p>	<p style="text-align: right;">Page 100</p> <p>1 documented?</p> <p>2 A. It looks like at 7:34.</p> <p>3 Q. What page are you looking at?</p> <p>4 MR. FINKEL: Exhibit 2-2, the last page.</p> <p>5 BY MR. FLADSETH:</p> <p>6 Q. All right. So Exhibit 2-2, it has some times 7 written across the top. The first one is 0734. And 8 then you go down the list to the O2 sat. Looks like 9 it's 100 all the way across for all the times there; is 10 that right?</p> <p>11 A. Correct.</p> <p>12 Q. So as soon as you got the endotracheal tube 13 in, was Cynthia immediately being oxygenated at 14 100 percent?</p> <p>15 A. It appears that way, correct.</p> <p>16 Q. Okay. What kind of O2 monitor was that? I 17 mean, is it like one of those prongs you put on the 18 finger or was someone actually, you know, sticking a 19 needle in and drawing the blood?</p> <p>20 A. No. It's a noninvasive monitor of some sort. 21 Whether they had it on her ear or her nose or her 22 finger, I don't know.</p> <p>23 Q. But it ensured that the maximum amount of 24 oxygen was getting in and she was being oxygenated with 25 at 100 percent?</p>
<p style="text-align: right;">Page 101</p> <p>1 A. Correct.</p> <p>2 Q. And that's from 0734 to, looks like, 0830, 3 correct?</p> <p>4 A. Correct.</p> <p>5 Q. And how long were you in the critical room 6 attending to Cynthia Gutierrez?</p> <p>7 A. I don't recall, but probably at least for a 8 half an hour.</p> <p>9 Q. And were you ever having any trouble 10 oxygenating her during that time?</p> <p>11 A. No.</p> <p>12 Q. During the time that you were in the critical 13 care room with Cynthia, was any suctioning done for any 14 reason?</p> <p>15 A. Yes..</p> <p>16 Q. When was it first done?</p> <p>17 A. The -- once the endotracheal tube is placed, 18 the respiratory therapist takes over that. I get the 19 tube in. I hold my fingers on it to make sure it 20 doesn't move. They take over and secure it, and then I 21 move on to my next project. They take over.</p> <p>22 The routine of the respiratory therapist is to 23 suction immediately after they intubate a patient.</p> <p>24 Q. Did you see whether the respiratory therapist 25 suctioned in this case or not?</p>	<p style="text-align: right;">Page 102</p> <p>1 A. I did not see him do it. I know he did it 2 but...</p> <p>3 Q. How do you know he did it?</p> <p>4 A. Because he told me.</p> <p>5 Q. When did he tell you?</p> <p>6 A. Shortly after when he suctioned, he pulled up 7 a piece of food.</p> <p>8 Q. So how long after you intubated Cynthia did 9 the respiratory therapist pull up a piece of food?</p> <p>10 A. I don't know.</p> <p>11 Q. Was it seconds?</p> <p>12 A. Minutes.</p> <p>13 Q. Like how many minutes? Like two minutes? Ten 14 minutes?</p> <p>15 A. I don't have an answer to that.</p> <p>16 Q. Okay. So let me see if I can just find any 17 permeameter.</p> <p>18 It wasn't more than an hour, was it?</p> <p>19 A. Oh, certainly not.</p> <p>20 Q. Okay. Was it closer to five minutes or 21 20 minutes?</p> <p>22 A. More on the two- to five-minute time.</p> <p>23 Q. Okay. Did you actually see a piece of food 24 yourself?</p> <p>25 A. Yes. He showed it to me.</p>

STEWART LAUTERBACH, M.D., VOLUME II - 12/18/2017

Page 139		Page 140
1 A. I don't understand your question.		1 box for the initial vital signs. Do you see that?
2 Q. Well, the reason you want to know what the		2 A. The bottom right on 179?
3 cause is so that would dictate what kind of treatment		3 Q. No. The numbers at the bottom right, but now
4 you provide, correct?		4 I'm up at the top.
5 A. That would be on the backs of the critical		5 A. Okay.
6 care doctors.		6 Q. The initial vital signs.
7 Q. All right.		7 A. Okay. Yes.
8 A. I stabilize the patient. That's my job.		8 Q. And who entered that information?
9 Q. Okay. What did Dr. Kang say, if anything,		9 A. I have no idea. I assume one of the nurses.
10 when you told him that you thought the patient had		10 But I'd point out that this is after Dr. Kang
11 aspirated some food?		11 has already seen the patient.
12 A. I don't remember that he responded to that.		12 Q. How do you know that?
13 He usually comes down, sees the patient, says, "I'll		13 A. On page 182, progress note put in by the
14 admit the patient," and leaves. And that's what I know.		14 scribe: "Dr. Kang at bedside. He will admit patient.
15 Q. Do you know if Dr. Kang documented anything		15 7:45."
16 about food being in the airway or aspiration or anything		16 Q. So going down the page a little bit, it says
17 like that?		17 "uremic frost."
18 A. I do not know.		18 What does that mean?
19 Q. Did you have any discussion with Dr. Kang		19 A. Which page are you on?
20 about whether Dilaudid may have played a role in the		20 Q. 179, page 3 of Exhibit 2.
21 crash or not?		21 A. Uremic frost is a general appearance that
22 A. I have no recollection of having a discussion		22 renal failure patients have that gives them kind of
23 like that.		23 whitish color.
24 Q. So looking at the third page of Exhibit 2,		24 Q. And had you observed that?
25 which is 179 on the bottom right, so there's a little		25 A. Yes.
Page 141		Page 142
1 Q. Page 180, this is the fourth page of		1 Q. Okay. So is this the X-ray that's taken at
2 Exhibit 2. Do you see that?		2 the bedside immediately after you intubated?
3 A. What am I looking at?		3 A. Correct.
4 Q. Are you -- are you on the page?		4 Q. So how low was it?
5 A. Yes.		5 A. I don't recall.
6 Q. Okay. You see where it says "X-ray, positive		6 Q. So you, what, pulled it back out a bit?
7 findings"?		7 A. Yeah, I measured.
8 A. Yes.		8 Q. So what was the measurement initially that you
9 Q. It says "ET low."		9 had used?
10 What does that mean?		10 A. I don't recall.
11 A. We alluded to that earlier; that on the X-ray,		11 Q. Was there somewhere that says something like
12 the endotracheal tube was repositioned. The radiologist		12 24 centimeters or something like that?
13 then reads the X-ray after the fact, and that was one of		13 A. Yeah, it would have been 24 centimeters at the
14 his findings. I had already acted on that.		14 teeth is usually what they do.
15 Q. So what time was the X-ray that's read as ET		15 Q. And then that ended up being too low?
16 tube low?		16 A. Apparently.
17 A. You would have to go back and look at the		17 Q. And what -- what was the new number?
18 X-ray -- the full X-ray report for a time stamp on it.		18 A. I don't know.
19 Q. So there should be a chest X-ray report at		19 Q. Did you document anywhere in your record that
20 some time that shows the ET tube was low?		20 the tube had been placed too low and then moved?
21 A. That's correct.		21 A. I -- I did in -- oh, I saw it somewhere.
22 Q. And when did you first learn that the ET tube		22 "Position adjusted."
23 was low?		23 Q. Where are you looking?
24 A. When I looked at the X-ray at the time it was		24 A. We went through this before under the
25 taken.		25 procedure note.

## EXHIBIT E

1 JAMES M. NELSON, ESQ. (State Bar No. 91682); [jnelson@dndmlawyers.com](mailto:jnelson@dndmlawyers.com)  
2 JOSEPH E. FINKEL, ESQ. (State Bar No. 167397); [jfinkel@dndmlawyers.com](mailto:jfinkel@dndmlawyers.com)  
3 ALEXANDER M ARONOV, ESQ. (State Bar No. 316839); [aaronov@dndmlawyers.com](mailto:aaronov@dndmlawyers.com)  
4 DONNELLY NELSON DEPOLO MURRAY & EFREMSKY  
5 A Professional Corporation  
201 North Civic Drive, Suite 239  
Walnut Creek, CA 94596  
Tel. No. (925) 287-8181  
Fax No. (925) 287-8188

6 Attorneys for Defendant  
Elliot Brandwene, M.D. and Stewart Lauterbach, M.D.

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 CYNTHIA GUTIERREZ, JOSE HUERTA,  
SMH, RH and AH. Case No. 16-CV-02645-S

12 Plaintiffs,  
13  
vs.  
**DECLARATION OF DANIEL  
McDERMOTT, M.D., IN SUPPORT OF  
DEFENDANT STEWART LAUTERBACH,  
M.D.'S MOTION FOR SUMMARY  
JUDGMENT**

SANTA ROSA MEMORIAL HOSPITAL, ST.  
JOSEPH HEALTH and DOES 1-50, inclusive, - Date: June 8, 2018  
Defendants. - Time: 9:00 AM  
Dept.: Courtroom 1 - 17<sup>th</sup> Floor

17 **Complaint Filed:** May 17, 2016  
**Trial:** November 19, 2018

**ASSIGNED FOR ALL PURPOSES TO:  
HON. SUSAN ILLSTON**

21 I, Daniel McDermott, M.D. declare as follows:

1. I am a physician licensed to practice medicine in the State of California.

23       2. My education, training & experience consist of the following: I received my medical  
24 degree from the University of California, Los Angeles School of Medicine in 1993. I completed a  
25 residency in Emergency Medicine at Harbor UCLA Medical Center in 1996. From 1998 to  
26 November 2006, I was an Associate Clinical Professor with the Division of Emergency Medicine at  
27 the University of California, San Francisco. I have been a Per Diem Attending and Associate  
28 Clinical Professor in the Department of Emergency Medicine at the University of California, San

1 Francisco since 2006. I am an Attending Physician since 2006 as well as the Vice Chairman with  
2 the Emergency Department at California Pacific Medical Center. I am Board Certified in Emergency  
3 Medicine. A true and correct copy of my Curricular Vitae is attached hereto.

4 3. I was asked by the law firm of Donnelly, Nelson, Depolo, Murray & Efremsky to  
5 review documents related to the care and treatment rendered by Stewart Lauterbach, M.D. to  
6 plaintiff Cynthia Gutierrez and to render an opinion regarding whether that care and treatment was  
7 within the applicable standard of care.

8 4. Having been a full-time emergency physician in an acute care emergency department  
9 for over 20 years, I am familiar with the standard of care as it applies to an emergency room  
10 physician such as Stewart Lauterbach, M.D. I am familiar with the degree of skill, knowledge and  
11 care that other like emergency physicians would ordinarily possess, exercise and use in  
12 circumstances similar to those presented in this case. I feel qualified to opine regarding the care  
13 and treatment provided by Dr. Lauterbach to Cynthia Gutierrez under the circumstances of this case.

14 5. In connection with preparing this Declaration, I have reviewed the following materials  
15 in formulating my opinions: excerpts from the medical records of Santa Rosa Memorial Hospital and  
16 the deposition transcript of Dr. Lauterbach.

17 6. Based on my review of the above-referenced materials, I understand the pertinent  
18 facts to be as follows:

19 a. Plaintiff Cynthia Gutierrez presented at the Santa Rosa Memorial Hospital  
20 Emergency Department on February 25, 2015 at 03:26 a.m. with complaints of shortness of breath.  
21 She was evaluated and treated by Elliot Brandwene, M.D. and discharged at 7:00 a.m. Ms.  
22 Gutierrez waited in the Emergency Department waiting room for her ride home. (Records from  
23 Santa Rosa Memorial Hospital, 000219-000238.)

24 b. At 7:20 a.m., the Emergency Department Nursing Staff were informed that Ms.  
25 Gutierrez was unresponsive and had collapsed. (Records from Santa Rosa Memorial Hospital,  
26 000243-000245, 000257-000263.)

27 c. The nursing staff immediately began CPR and placed a Bag-Valve-Mask  
28 (BVM) on Ms. Gutierrez to provide positive-pressure ventilation. Ms. Gutierrez was transported on a

1 stretcher to a critical care room in the Emergency Department while CPR and BVM continued to be  
2 performed. (Records from Santa Rosa Memorial Hospital, 000249.)

3                   d. Dr. Lauterbach observed Ms. Gutierrez being transported to critical care room  
4 # 25 and arrived to provide care and assistance. (Deposition Transcript of Stewart Lauterbach, M.D.,  
5 21:7-18, 79:4-25, 80:1-12.)

6                   e. Dr. Lauterbach gathered the necessary equipment in preparation for  
7 intubation of Ms. Gutierrez. Subsequently, he used a manual laryngoscope to visualize Ms.  
8 Gutierrez's epiglottis and her arytenoids. (Deposition Transcript of Stewart Lauterbach, M.D., 29:13-  
9 25, 30:1-2, 93:19-25, 94: 1-22.)

10                  f. At 7:28 a.m., Dr. Lauterbach proceeded to insert an 8mm endotracheal tube  
11 (ETT) into Ms. Gutierrez's trachea. The ETT was positioned with Ms. Gutierrez's lips at the 24cm  
12 mark. Immediately thereafter, Dr. Lauterbach conducted the end-tidal CO<sub>2</sub> measurement and  
13 confirmed the proper placement of the ETT. Additionally, Dr. Lauterbach confirmed the proper  
14 placement of the ETT by visualizing the vocal cords, observing the rising and falling of Ms.  
15 Gutierrez's chest, and noting condensation in the tube. (Records from Santa Rosa Memorial  
16 Hospital, 000243-000245; 000257-000262; Deposition Transcript of Stewart Lauterbach, M.D.,  
17 93:18-98:19.)

18                  g. At 7:39 a.m., Dr. Lauterbach ordered an immediate portable x-ray of Ms.  
19 Gutierrez's chest. The x-ray showed moderate cardiomegaly with a biventricular contour. The ETT  
20 tube was confirmed to be in the trachea with the tip at the carina. The ETT was withdrawn by 2-3cm  
21 for more optimal placement. Ms. Gutierrez was oxygenated at 100% immediately upon placement  
22 of the ETT. (Records from Santa Rosa Memorial Hospital, 000274; Deposition Transcript of Stewart  
23 Lauterbach, M.D., 98:20-99:24, 100:1-25.)

24                  h. Ms. Gutierrez was placed on a ventilator and connected to cardiac monitors.  
25 The cardiac monitor showed a narrow complex bradycardic rhythm. Dr. Lauterbach ordered calcium  
26 and bicarbonate based on the possibility of hyperkalemia. Subsequently, Dr. Lauterbach ordered  
27 epinephrine. (Records from Santa Rosa Memorial Hospital, 000257-000271.)

28                  ///

1                   i.         At 7:45 a.m., Ms. Gutierrez was evaluated by Dr. Kang and admitted into in  
2 the Intensive Care Unit (ICU). (Records from Santa Rosa Memorial Hospital, 000257-000271.)

3         7.         Based on my review of the aforementioned materials, my background and training,  
4 and expertise as an emergency medicine physician, I believe that Dr. Lauterbach met the standard  
5 of care in every respect.

6         8.         It is my opinion that Dr. Lauterbach's decision to intubate Ms. Gutierrez on February  
7 25, 2015 at 7:28 a.m. was entirely appropriate and within the standard of care. The Emergency  
8 Department staff was notified that Ms. Gutierrez had become unresponsive and collapsed in the  
9 waiting room. The nursing staff charted Ms. Gutierrez as being neurologically non-responsive,  
10 apneic, and having a pulse electrical activity (PEA) of 38. I believe that intubation was necessary at  
11 that time in order to preserve the patient's life.

12         9.         It is my opinion that Dr. Lauterbach acted within the standard of care on February 25,  
13 2015 at 7:28 a.m. when he intubated Ms. Gutierrez. First, Dr. Lauterbach gathered the necessary  
14 equipment to quickly begin the intubation. Second, he visualized Ms. Gutierrez's epiglottis and her  
15 arytenoid with a manual laryngoscope. Third, he placed an 8mm ETT into Ms. Gutierrez's trachea  
16 and positioned it at her lips at the 24 cm mark. Dr. Lauterbach then confirmed the proper placement  
17 of the ETT by conducting an end-tidal CO<sub>2</sub> measurement, visualizing her vocal cords, observing the  
18 rising and falling of her chest, and noting condensation in the tube.

19         10.         It is my opinion that Dr. Lauterbach acted within the standard of care on February 25,  
20 2018 when he confirmed the placement of the ETT by portable x-ray. Immediately upon completing  
21 the intubation, Dr. Lauterbach ordered a bed side portable x-ray of Ms. Gutierrez's chest which  
22 showed the ETT to be in place at the tip of the Carina. It is further my opinion that Dr. Lauterbach  
23 then appropriately and within the standard of care adjusted the tip by 2-3cm to obtain optimal  
24 placement. Subsequently, Ms. Gutierrez was then connected to a ventilator by the respiratory  
25 therapist and admitted to the ICU.

26         11.         I have carefully reviewed the provided medical records pertaining to Cynthia Gutierrez  
27 and it is my opinion that her intubation and resuscitation by Stewart Lauterbach, M.D. was within the  
28 standard of care and there is no evidence that Dr. Lauterbach was in any way negligent in his care

1 and treatment of Ms. Gutierrez.

2 12. It is further my opinion that no negligent acts or omissions on the part of Dr.  
3 Lauterbach caused or contributed to the harm, injury or damage allegedly suffered by Ms. Gutierrez.

4 I declare under penalty of perjury that the foregoing statements are true and correct.

5 Executed within the United States on 23 APRIL, 2018.

6  
7 By:  
8

9  
10  
11 DANIEL MCDERMOTT, M.D.  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## **Curriculum Vitae**

Daniel A. McDermott, MD

Date of Preparation: 16 August, 2017

Place of Birth: Perth Amboy, New Jersey

Date of Birth: 2 October, 1966

Current Position: Attending Physician and Vice Chairman  
Emergency Department  
California Pacific Medical Center

Business Address: 2333 Buchanan Street, Level A  
San Francisco, CA, 94115

Home Address: 183 Carl Street  
San Francisco, CA 94117

Business Phone: 415-600-3333

### **Education:**

July 1993-June 1996  
Residency in Emergency Medicine  
Harbor-UCLA Medical Center  
Torrance, California

June 1989-June 1993  
UCLA School of Medicine  
Los Angeles, California  
Doctor of Medicine

July 1990-June 1991  
University of Iowa  
Iowa City, Iowa  
American Heart Association, Research Fellow

June 1985-June 1989  
University of California, Riverside  
Riverside, California  
Bachelor of Science, Biomedical Sciences

**Licenses, Certifications**

June 1998, Board Certified in Emergency Medicine

State of California, Board of Medicine-license G080226

**Employment:**

November 2006-present  
Attending Physician, Emergency Department

Vice Chairman-December 2010-present  
California Pacific Medical Center  
San Francisco, California

November 2008-July 2012  
Site Director  
Pediatric Emergency Department  
California Pacific Medical Center  
San Francisco, California

November, 2006-Present  
Per Diem Attending  
Faculty Member, Associate Clinical Professor, Step 1  
Department of Emergency Medicine  
University of California, San Francisco

**Previous Employment:**

October 1998-November, 2006  
Associate Clinical Professor  
Division of Emergency Medicine  
Department of Medicine  
University of California, San Francisco

**Honors and Awards:**

March, 2017  
Outstanding Author-Adult Emergency Medicine  
The Approach to the Patient with Syncope in the Emergency Department

March, 2009  
Achieving Continuous Excellence (ACE) Award, CPMC Medical Center

March 2005

Nominated for Outstanding Preceptor, Foundations in Patient Care course

July 2000

UCSF Division of Emergency Medicine Teaching Award

March 1992

Alpha Omega Alpha Research Prize for meritorious research in Biomedical Sciences

**Professional Activities:**

May, 2014

Sub-investigator

BI 655075 Re-Verse-AD study

California Pacific Medical Center

September, 2013

Member, Scientific Committee

First International Workshop on Syncope Risk Stratification in the Emergency Department

Lake Gargnano, Italy

July 2013-present

ED representative

Utilization Management Committee at CPMC

June, 2013-present

Consultant-Applied Practice Strategies-Boston, MA

On line medico-legal primer to reduce risk in the ED

March, 2013

Kaizen Participant

Sepsis protocol at CPMC

June, 2011-present

Quality of Care Committee, CPMC

Review for complicated cases in the ED

1999-2006

Member, Society for Academic Emergency Medicine

1999-2006

Member, American Academy of Emergency Medicine

2001-2005  
California Academy of Medicine

**Invited Papers, Lectures and Presentations**

September, 2013  
Survey Results presentation  
First International Workshop on Syncope Risk Stratification in the Emergency Department  
Lake Gargnano, Italy

July, 2013  
The San Francisco Syncope Rule to Predict Patients with Serious Outcomes  
Noon conference for the internal medicine residents  
CPMC

Also presented at the following:

July, 2013  
Morning Report for the Departments of Medicine and Cardiology  
CPMC

April, 2013  
Noon conference for the internal medicine residents  
CPMC

November, 2012  
Grand Rounds, Humanitas Medical Center  
Milano, Italy

July, 2012  
UCSF Emergency Department Resident Conference

November, 2011  
Topics of Emergency Medicine  
UCSF CME conference

August, 2010  
UCSF Emergency Department Resident Conference

July, 2010  
CPMC Resident Rounds

November, 2008  
Topics in Emergency Medicine  
UCSF CME Conference

July 2008  
UCSF Emergency Medicine Residency Conference

September, 2007  
Medicine Grand Rounds, California Pacific Medical Center

September 2006  
Presented at Highland General Hospital Department of EM Grand Rounds

September, 2006  
Grand Rounds  
Presented to the faculty at The Community Hospital of the Monterey Peninsula

August, 2006  
Grand Rounds  
Presented to the faculty at San Francisco General Hospital

June, 2006  
Grand Rounds  
Presented to the EM residents at UCSF-Fresno

May, 2006  
California Emergency Physicians, Annual CME Symposium, Riverside,  
California

April, 2006  
Inter-American Conference on Emergency Medicine  
Buenos Aires, Argentina

April, 2006  
California Emergency Physicians, Annual CME Symposium, Sonoma, California

October, 2005  
Topics of Emergency Medicine, a UCSF CME Conference

August 2005  
Highland General Hospital, Emergency Medicine Grand Rounds

March 2005  
For emergency physicians at Kaiser South San Francisco

October 2004  
Topics in Emergency Medicine, a UCSF CME Conference

August 2004  
For Highland General Hospital Emergency Medicine Conference

August 2004  
For emergency physicians at Kaiser, San Francisco

May 2004  
For emergency physicians at Kaiser, Vallejo

January, 2013  
Expert Panel Discussant  
Highly sensitive troponin: Have we ruled in how to rule out?  
CPMC Cardiology ED Grand Rounds

November, 2010  
“Fall Down, Go Boom”-Pediatric Head Injury  
Pediatric Specialty CME Symposium  
Sonoma, California

November, 2010  
Pediatric Head Injury  
Pediatric Residents at CPMC  
Also presented December 2009 and May, 2010

May, 2009  
Acute Stroke in the Emergency Department  
State of the Art Stroke Symposium  
CPMC CME Conference

October, 2007  
Intersessions for 3<sup>rd</sup> year medical students at UCSF  
Course IDS 112  
Invited Panel Discussant  
Ethical issues in different specialties on death and dying  
Also Participated in October 2006

December, 2006  
Guest Instructor and Proctor

Leviton Difficult Airway Course and Cadaver Lab  
Given for San Francisco Paramedics Association  
Also given April, 2006

November, 2006  
Difficult Airway Workshop  
Topics of Emergency Medicine, a UCSF CME Conference

Also presented October 2005

September 2006  
IDS 101-Prologue Block  
The Danovic Case  
Presented to the 1<sup>st</sup> year Medical School Class at UCSF

August, 2006  
Lecture, Cardiovascular Emergencies  
Nursing Training Program  
UCSF Emergency Department

Also presented February, 2006

March 2006  
Oral presentation  
Acute Myocardial Infarction and ECG Abnormalities in Emergency  
Department Patients Presenting with Syncope  
SAEM Western Regional Research Conference, Redondo Beach, CA

February, 2006  
Panel Member  
Emergency Medicine Advisory Committee for UCSF Medical Students

December 2005  
Guest participant  
Heart Tone Detection Study  
UCSF Division of Cardiology

October 2005  
Invited guest panelist  
Preceptor Workshop, for Foundations in Patient Care, IDS 131/132

September, 2005

Guest Speaker

EM Advisory Panel for the Emergency Medicine Interest Group

May, 2005

Moderated Poster presentation

Use of Hospital Admission for Emergency Department Patients with Syncope

SAEM Annual Conference, NY, NY

April, 2005

Moderated Poster presentation

Use of Hospital Admission for Emergency Department Patients with Syncope

SAEM Western Regional Conference

November, 2004

The Evaluation of Syncope

Lecture, The Emergency Medicine Interest Group, UCSF Medical Students

June, 2004, as well as May, September, 2003

Lecture, Medico-Legal Primer

UCSF Primary Care Residents Conference

April, 2004

Guest Participant, Career Planning Session

Emergency Medicine Interest Group for The UCSF Medical Students

November, 2003

Lecture, Follow-Up Conference

Joint Conference with UCSF Division of Emergency Medicine and Highland

General Hospital Emergency Medicine

October, 2003, as well as October 2000-2002

Lecture, Local and Regional Anesthesia Workshop

Topics of Emergency Medicine

September, 2003

Lecture, Apparent Life Threatening Events

Joint Conference with UCSF Division of Emergency Medicine and the

Department of Pediatrics

June, 2003

Guest Participant, Babinski research study, Department of Neurology,  
UCSF Medical Center

May, 2003

Oral Poster Presentation, Syncope and EKG's  
SAEM National Meetings, Boston, MA

April, 2003

Oral Presentation, Syncope and EKG's  
SAEM Western Regional Conference, Scottsdale, AZ

April, 2003

Guest Participant, Career Planning Session  
Emergency Medicine Interest Group, for UCSF Medical Students

June, 2002

Lecture, The Difficult Airway  
UCSF Emergency Department Faculty Education Conference

December 2001, as well as September 2000, February 2001  
Lecture, Nurse In-service on Abdominal Trauma

December 2001, as well as February 1999, 2001 and September 2000  
Lecture, Nurse In-service on ENT Emergencies

October 1999

Lecture, Maxillo-facial Trauma  
Topics of Emergency Medicine

**Administrative Duties:**

December, 2010-Present  
Vice Chair, Emergency Department  
CPMC

August, 2017  
Neurosciences Search Committee-Chairman

April, 2017-Present  
Neurosciences Quality of Care Committee

January, 2015-Present  
ED Quality of Care Committee

November , 2010  
CPMC Ophthalmology Reappointment Committee

June, 2010  
CPMC Surgery Reappointment Committee

November, 2008-July 2012  
Care of the Pediatric Patient  
CPMC Campus

September, 2008-July, 2012  
Site Director  
Pediatric Emergency Department  
CPMC, California Campus

July, 2007  
Coordination of Difficult Airway Cart at CPMC

June, 2007-present  
ED Physician Liason, Stroke Service at CPMC

March 2005-November 2006  
Physician Representative, The San Francisco Emergency Physicians Association  
Member of the Executive Committee

October, 2004-November 2006  
Physician Representative, Hospital Committee on the Prevention of Delirium in  
Patients with Alcohol Withdrawal

June 1998-November 2006  
Schedule Coordinator, UCSF Emergency Department

1998-2003

Physician Representative, Nurse Liason/Collaborative Practice Committee

1999-November 2006

Housestaff Coordinator/Schedule Coordinator for Rotation in the Emergency Department

July 2000-2004

ED Chart Compliance Coordinator

July 2002-November 2006

ED Staffing and Credentialling Coordinator

**Teaching:**

November, 2009

Instructor, Pediatric ED Nursing Skills

Adult EKG interpretation

September, 2009

Instructor, Pediatric Intern Procedure Course

May, 2006

Physician Preceptor, IDS 111:Longitudinal Clinical Experience

May, 2006

ACLS instructor for UCSF Medical Students

April, 2006

Instructor, UCSF Medical Student Course on Advanced Procedures Lab

April, 2005

Physician Preceptor, IDS 111: Longitudinal Clinical Experience

April, 2005

ACLS Instructor, for UCSF Medical Students

March, 2005

Instructor, UCSF Medical Student Course on Advanced Procedures Lab

June, 2004, as well as June 2003

ACLS instructor for the Incoming Surgical Interns

May, 2004  
ACLS Instructor, for UCSF Medical Students

March, April, 2004  
Instructor, UCSF Medical Student Course on Advanced Procedures Lab

April, 2000-2006  
Oral Board Reviewer, Highland General Hospital Emergency Medicine Residents  
6 Residents per 4 hour session, Bi-annually

June 2000-2007  
Foundations in Patient Care-Course IDS-131/132  
Physician Sponsor for 1<sup>st</sup> year UCSF Medical Students  
6 hours per month during the Academic Year

June, 2000-June 2002  
ACLS Course Coordinator for DOM incoming interns

June, 1999  
ACLS Instructor for DOM incoming interns

### **Clinical Responsibilities:**

My primary current role is attending in the Emergency Department at CPMC, where I am Vice Chairman. I work clinically approximately 100 hours per month in this regard, usually 12-13 shifts. My responsibilities include direct patient care in the Emergency Department. I was previously the site director at the Pediatric ED as well at CPMC.

I also work 1-2 shifts as a supervising attending in the Emergency Department at UCSF, where I oversee interns and residents and coordinate the care of patients in the ED.

### **Clinical Research Program:**

My research interests are in the evaluation of patients presenting to the Emergency Department with Syncope. In collaboration with my mentor, Dr. Jim Quinn, we have developed a prediction rule for short-term serious outcomes, The San Francisco Syncope Rule (SFSR). This has been the largest prospective syncope trial to date. We

have recently published the derivation of the rule and are currently submitting the validation phase for publication. We also plan to implement the rule at multiple centers as well. We have also looked into how well the SFSR has performed at predicting one-year mortality in the derivation cohort, and would like to evaluate for the validation cohort as well. I have received REAC funding for further investigation on this project. We are also interested in the classification of low risk patients with syncope, and would like to target this population to determine if they can be safely discharged from the Emergency Department.

In addition, I also am interested in syncope patients presenting with abnormal EKG's. I have looked at specific EKG abnormalities associated with serious outcomes as well as the association with acute myocardial infarction.

I am working with another colleague, John Stein, with the use of Ultrasound for peripheral IV access in patients that have difficult IV access. We currently have completed our randomized trial.

### **Research Support:**

June, 2005

Mentor: Dr. Jim Quinn

Project: Evaluation of the San Francisco Syncope Rule to Predict Long Term Mortality

Source: REAC-UCSF School of Medicine

Amount: \$9,980

May 2005

Mentor: Medical Scholl Research Program, Summer Research Fellowship

Project: Nursing trial for Ultrasound-Guide Peripheral Intravenous Cannulation

Source: Genentech Foundation/School of Medicine

Amount: \$3,200

May, 2004

Mentor, Medical Student Research Program, Summer Research Fellowship

Project: Ultrasound-Guided Peripheral Intravenous Cannulation

Source: Genentech Foundation/School of Medicine

Amount: \$3200

**Peer Reviewed Publications:**

McDermott, DA, Meller, ST, Gebhart, GF, Guterman, DD. Use of an indwelling catheter for examining cardiovascular response to pericardial administration of bradykinin in rat. *Cardiovascular Research* 1995; 30:39-46.

Quinn, JV, Stiell, IG, McDermott, DA, Sellers, KA, Kohn, MA, Wells, GA. Derivation of the San Francisco Syncope Rule to predict patients with short term Outcomes, *Annals of Emergency Medicine* 2004; 43:224-232

Quinn, JV, Stiell IG, McDermott, DA, Kohn MA, Wells GA. The San Francisco Syncope Rule vs. Physician Judgment and Clinical Decision Making. *Am J Emerg Med.* 2005 Oct; 23(6): 782-6.

Quinn, JV, McDermott, DA, Stiell, IG, Kohn, MA, Wells, GA. Prospective Validation of the San Francisco Syncope Rule to Predict Patients with Serious Outcomes. *Annals of Emergency Medicine* 2006; 47(5): 448-454.

Quinn, JV, McDermott, DA, Kramer, N, et al. Death After Emergency Department Visits for Syncope: How Common and Can It Be Predicted. *Annals of Emergency Medicine* 2008; 51(5): 585-90.

Quinn, JV, Kramer, N, McDermott, DA. Validation of the Social Security Death Index (SSDI): An Important Readily-Available Outcomes Database for Researchers. *West JEM* 2008 9(1) article 2.

McDermott, D, Quinn, J, Murphy, C. Acute Myocardial Infarction in Patients with Syncope. *CJEM* 2009; 11(2):156-60.

Stein, JC, George, B, River, G, Hebig, A, McDermott, DA. Ultrasonographically Guided Peripheral Intravenous Cannulation in Emergency Department Patients With Difficult Intravenous Access: A Randomized Trial. *Ann Emerg Med.* 2009; 54: 33-40.

Quinn JV, McDermott D, Rossi J, Stein J, Kramer N. Randomized controlled trial of prophylactic antibiotics for dog bites with refined cost model. West J Emerg Med. 2010 Dec;11(5):435-41

Quinn, JV, McDermott, DA. ECG Findings in Emergency Department Patients with Syncope. Acad Emerg Med. 2011 Jul;18(7):714-8.

Costantino G, Solbiati M, Casazza G, Bonzi M, Vago T, Montano N, McDermott D, Quinn J, Furlan R. Usefulness of N-terminal pro-B-type natriuretic Peptide increase as a marker for cardiac arrhythmia in patients with syncope. *Am J Cardiol* 2014;113(1):98-102.

Costantino G, Casazza G, Reed M, Bossi I, Sun B, Del Rosso A, Ungar A, Grossman S, D'Ascenzo F, Quinn J, McDermott D, Sheldon R, Furlan R. Syncope risk stratification tools vs. clinical judgment: an individual patient data meta-analysis. Am J Med. 2014 Nov;127(11):1126.e13-25.

Sun BC, Costantino G, Barbic F, Bossi I, Casazza G, Dipaola F, McDermott D, Quinn J, Reed M, Sheldon RS, Solbiati M, Thiruganasambamoorthy V, Krahn AD, Beach D, Bodemer N, Brignole M, Casagrande I, Duca P, Falavigna G, Ippoliti R, Montano N, Olshansky B, Raj SR, Ruwald MH, Shen WK, Stiell I, Ungar A, van Dijk JG, van DN, Wieling W, Furlan R. Priorities for Emergency Department Syncope Research. *Ann Emerg Med* 2014. Volume 64, Issue 6, December 2014, Pages 649–655.e2

Costantino G, Sun BC, Barbic F, Bossi I, Casazza G, Dipaola F, **McDermott D, Quinn J, Reed MJ, Sheldon RS, Solbiati M, Thiruganasambamoorthy V, Beach D, Bodemer N, Brignole M, Casagrande I, Del Rosso A, Duca P, Falavigna G, Grossman SA, Ippoliti R, Krahn AD, Montano N, Morillo CA, Olshansky B, Raj SR, Ruwald MH, Sarasin FP, Shen WK, Stiell I, Ungar A, Gert van Dijk J, van Dijk N, Wieling W, Furlan R.** Syncope clinical management in the emergency department: a consensus from the first international workshop on syncope risk stratification in the emergency department. Eur Heart J. 2016 May 14;37(19):1493-8.

Sorenson, SB, Baranzangi, N, Chen, C, Wong, C, Grosevenor, D, Rose, J, Bedenk, A, Morrow, M, McDermott, D, Hove, JD, Tong, DC. Generalized Safety and Efficacy of Simplified Thrombolysis Treatment (SMART) Criteria in Acute Ischemic Stroke: The

MULTI SMART Study. J Stroke Cerebrovasc Dis. 2016-accepted for publication.

**Non-Peer Reviewed Publications:**

McDermott,D., Henneman,P. Penetrating Abdominal Trauma,  
Emergindex, Micromedex, Inc., 1995.

Koenig, KL. Emergency Medicine: Pre-Test Self Assessment and Review, Contributor, Pulmonary Emergencies chapter, McGraw Hill, 2000.

Quinn, JV, McDermott, DA. Editorial Correspondence-Risk Prediction Patients with Syncope. Annals of Emergency Medicine 2004; 44(4): 422-424.

Quinn, J, McDermott, D. Editorial Correspondence-Syncope and NAMCS.  
Acad Emerg Med. 2005 Apr;12(4):381.

Quinn, JV, McDermott, D. Editorial Correspondence: Medical decision-making and the San Francisco Syncope Rule. Ann Emerg Med. 2006 Dec; 48(6): 762-3.

Quinn, J, McDermott, D. Editorial Correspondence-External validation of the San Francisco Syncope Rule. Ann Emerg Med. 2007 Dec; 50(6): 742-3.

McDermott, DA, Quinn, JV. The Approach to the Patient with Syncope in the Emergency Department, Up To Date, January 2007.

McDermott, DA, Quinn, JV. Editorial Correspondence-Response to “Failure to Validate the San Francisco Syncope Rule in an Independent Emergency Department Population.” Ann Emerg Med. 2009 May 53(5): 693.

Quinn J, McDermott D. ECG criteria of the San Francisco Syncope Rule. Ann Emerg Med. 2011 Jan;57(1):72-3

**Abstracts:**

Quinn, JV, McDermott, DA, Kohn, MA, McCulloch, CE, Stiell, IG, Wells, GA. Physician agreement in the evaluation of patients presenting with syncope. Acad Emerg Med 2001; 8:558.  
Abstract, accepted for poster presentation at SAEM, May, 2001.

Quinn, JV, McDermott, DA, Stiell, IG, Kohn, MA, Sellers, KA, Wells, GA. Physician judgment in evaluating patients with syncope. Acad Emerg Med 2002; 9:452-3.  
Abstract, accepted for poster presentation at SAEM, May 2002

Quinn, JV, Stiell, IG, Sellers, KA, McDermott, DA, Kohn, MA, Wells, GA, Callaham, ML. The San Francisco Syncope Rules to predict patients with serious outcomes. Acad Emerg Med 2002; 9:358.  
Abstract, accepted for plenary session at SAEM, May, 2002.

McDermott, DA, Quinn, JQ, Zaroff, JG. Syncope and electrocardiograms: What abnormalities are most significant and how sensitive is it for acute myocardial infarction (AMI)?  
Abstract, oral presentation at SAEM Western Regional Research Conference, April, 2003.

McDermott, DA, Quinn, JQ, Zaroff, JG. Syncope and electrocardiograms: What abnormalities are most significant and how sensitive is it for acute myocardial infarction (AMI)? Acad Emerg Med 2003; 10:515-516.  
Abstract, presented for moderated poster presentation at SAEM, May 2003.

Quinn, JV, Stiell, IG, Sellers, KL, McDermott, DA, Kohn, MA, Wells, GA. San Francisco Syncope Rule (SFSR) versus physician judgment for predicting patients with serious outcomes. Acad Emerg Med 2003; 10:539-540.  
Abstract, Oral presentation at SAEM, May, 2003

Quinn, JV, McDermott, DA, Stiell, IG, Sellers, KA, Kohn, MA, Wells, GA. Prospective Validation of The San Francisco Syncope Rule (SFSR) to predict patients with serious outcomes. Acad Emerg Med. 2004; 11:529-530.  
Abstract, Oral presentation at SAEM, May, 2004

Quinn, JV, McDermott, DA, Yeh, C, Stiell, IG, Kohn, MA. Death Rates of Emergency Department Patients with Syncope: Can the San

Francisco Syncope Rule Predict Long Term Mortality? Acad Emerg Med. 2005; 12(5): 9.  
Abstract accepted for plenary session at SAEM, May 2005.

McDermott, DA, George, B, Kramer, N, Stein, JC. Ultrasound Guidance for Difficult Peripheral Intravenous Access: A Randomized Trial. Acad. Emerg Med. 2005; 12(5): 48.  
Abstract, accepted for moderated poster presentation at SAEM, May 2005.

Quinn, JV, McDermott, DA, Kohn, MA, Stiell, IG, Wells, GA. Admission of Low Risk Patients with Syncope. Acad Emerg Med, 2005; 12(5): 126-127.  
Abstract, accepted for moderated poster presentation at SAEM, May 2005.

McDermott, DA, George, B, Nobay, F, Stein, JC. Using a Synthetic Model to Train Emergency Physicians for Ultrasound-Guided Peripheral Intravenous Catheterization. Acad Emerg Med, 2005; 12(5): 121.  
Abstract, accepted for poster presentation at SAEM, May 2005.

McDermott, DA, Quinn, JV, Murphy, C, Goldschlager, N. Acute Myocardial Infarction and ECG Abnormalities in Patients with Syncope.  
Abstract, accepted for moderated poster presentation at SAEM Western Regional Meeting, March, 2006.

Kramer, N, Quinn, JV, McDermott, DA. Who is really dead? How accurate is the social security death index.  
Abstract accepted for SAEM Western Regional Meeting and SAEM National Meeting. March 2006.

Quinn, JV, McDermott, DA, Kramer, N, Stein, JC. Prophylactic Antibiotics for Dog Bites: A RCT with redefined Cost Model. Acad. Emerg. Med, 2007; 14(5): 146.  
Abstract accepted for Moderated Poster presentation at SAEM, May 2007.

Tong, DC, Rose, J, Thomas, J, Phan, J, Bedenk, A, Barakos, J, McDermott, DA. Increasing Thrombolytic Treatment Rates: Results Utilizing Revised Treatment Criteria and a Multidisciplinary Stroke Education Program. Stroke 2008: 39(2): 608.

Abstract presented for poster presentation at the AHA Stroke meeting, February 2008.

Tong, DC, Rose, J, Barakos, J, Thomas, J, Bedenk, A, Phan, J, McDermott, DA. Initial Experience with Combined 64-slice CT Perfusion (ctp) and CT Angiography (cta) in Routine Practice. Potential and Pitfalls. *Stroke*, 2008; 39(2): 610.  
Abstract presented for poster presentation at AHA Stroke meeting, February 2008.

Tong, DC, Phan, J, Bedenk, A, Rose, J, Thomas, J, Barakos, J, McDermott, DA. Is Estimated Patient Weight Accurate for IV Rtpa Dosing in Acute Stroke? *Stroke*, 2008; 39(2): 707.  
Abstract presented for poster presentation at the AHA Stroke meeting, 2008.

Quinn, JV, McDermott, DA. ECG Findings in Emergency Department Patients with Syncope. Poster Presentation at the SAEM Annual Meeting, Boston, Ma. June, 2011

Costantino, G, Solbati, M, Casazza, G, Bonzi, M, Montano, N, McDermott, D, Quinn, J, Furlan, R. NT-pro BNP as a Marker for Cardiac Arrhythmia in Patients with Syncope. *Acad Emerg. Med*, 2013; 20(5): S138.  
Presented for oral presentation at SAEM Annual Meeting, Atlanta, GA, May, 2013.

## EXHIBIT F

1 JAMES M. NELSON, ESQ. (State Bar No. 91682); [jnelson@dndmlawyers.com](mailto:jnelson@dndmlawyers.com)  
2 JOSEPH E. FINKEL, ESQ. (State Bar No. 167397); [jfinkel@dndmlawyers.com](mailto:jfinkel@dndmlawyers.com)  
3 ALEXANDER M ARONOV, ESQ. (State Bar No. 316839); [aaronov@dndmlawyers.com](mailto:aaronov@dndmlawyers.com)

DONNELLY NELSON DEPOLO MURRAY & EFREMSKY

A Professional Corporation

201 North Civic Drive, Suite 239

Walnut Creek, CA 94596

Tel. No. (925) 287-8181

Fax No. (925) 287-8188

6 Attorneys for Defendant

Elliot Brandwene, M.D. and Stewart Lauterbach, M.D.

7

8 IN THE UNITED STATES DISTRICT COURT

9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10

11 CYNTHIA GUTIERREZ, JOSE HUERTA,  
SMH, RH and AH,

Case No. 16-CV-02645-SI

12 Plaintiffs,

13 vs.  
14 **DECLARATION OF ALEXANDER M.  
ARONOV IN SUPPORT OF STEWART  
LAUTERBACH, M.D.'S MOTION FOR  
SUMMARY JUDGMENT**

15 SANTA ROSA MEMORIAL HOSPITAL, ST.  
JOSEPH HEALTH and DOES 1-50, inclusive,

Date: June 8, 2018  
Time: 9:00 AM  
Dept.: Courtroom 1 – 17<sup>th</sup> Floor

16 Defendants.

17 Complaint Filed: May 17, 2016  
Trial: November 19, 2018

18 ASSIGNED FOR ALL PURPOSES TO:  
19 HON. SUSAN ILLSTON

20 I, Alexander M. Aronov, Esq., declare:

21 1. I am an attorney at law duly licensed in the State of California and admitted to  
22 practice before this Court. I am an attorney with the law firm Donnelly Nelson Depolo Murray &  
23 Efremsky, attorneys of record for Defendant Stewart Lauterbach, M.D. I have personal knowledge of  
24 the matters stated herein, and if called as a witness, I could and would testify competently thereto. I  
25 have participated in the litigation of this case and have reviewed the file.

26 2. I certify that the document attached hereto as Exhibit A is a true and correct copy of  
27 ECF Doc No. 1-Plaintiffs' Complaint filed in this litigation as downloaded and printed out by this  
28 office during the course of this litigation.

1       3. I certify that the document attached hereto as Exhibit B is a true and correct copy  
2 ECF Doc No. 56 - Plaintiffs' Second Amended Complaint filed in this litigation as downloaded and  
3 printed out by this office during the course of this litigation.

4       4. I certify that the documents attached hereto as Exhibit C are true and correct copies  
5 of excerpts from medical records pertaining to plaintiff in this action as subpoenaed by this office  
6 from Santa Rosa Memorial Hospital during the course of this litigation.

7       5. I certify that the documents attached hereto as Exhibit D are true and correct copies  
8 of excerpts from the deposition transcript of Stewart Lauterbach, M.D.

9       6. I certify that the document attached hereto as Exhibit E is a true and correct copy of  
10 the declaration of Daniel McDermott, M.D.

11 Dated: 4/25/2018

12 By:

  
ALEXANDER M. ARONOV